

Maryland Association of Boards of Education



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November 6, 2014

Dr. Jack Smith, Chief Academic Officer
Maryland State Department of
Education
200 West Baltimore Street
Baltimore, Maryland 21201

Ms. Betty Weller, President
Maryland State Education Association
140 Main Street
Annapolis, Maryland 21401

Dear Dr. Smith and Ms. Weller:

RE: MABE Comments on the State MCCRS Workgroup's Draft Recommendations

I am writing on behalf of the Maryland Association of Boards of Education (MABE) to offer comments on the draft recommendations which were distributed and discussed at the October 21, 2014, meeting of the Maryland College and Career-Ready Standards (MCCRS) and Partnership for Assessment of Readiness for College and Careers (PARCC) Implementation Review Workgroup (State Workgroup).

First, MABE greatly appreciates your collaborative leadership as co-chairs of the Workgroup which we view as a significant endeavor. Secondly, on behalf of all twenty-four local boards of education, I want to underscore MABE's support for the adoption and implementation of the Maryland College and Career-Ready Standards, including the development and administration of the new PARCC assessments. Lastly, MABE's comments primarily focus on the desire for a State Workgroup report that will provide the Governor and General Assembly with a comprehensive description and analysis of the work that: 1) has been done, 2) is being done, and 3) should be done. For example, MABE strongly supports references to the Race to the Top grant funding as it relates to specific implementation issues; and, MABE requests State Workgroup recommendations for new state funding initiatives in the areas of technology and professional development.

MABE views the pending standards and assessment issues as so important that our Immediate Past President, Katie Groth, established an internal MABE Committee on College and Career Readiness Standards to support the Association's participation on the State Workgroup. The charges set forth in the legislation establishing the State Workgroup address a wide array of complex, human resource and capital-intensive initiatives, including such diverse issues as: parental engagement, curriculum and assessment development, professional development, educator evaluation systems, and instructional and assessment-related technology infrastructure development.

Dr. Jack Smith
Ms. Betty Weller

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November 6, 2014

MABE's top priority throughout this process has focused on mitigating the unintended consequences of prematurely transitioning to the administering the new high school PARCC assessments in Algebra I and English 10 as "high stakes" graduation requirements. Therefore, MABE strongly supports the recent action of the State Board of Education to address the timing of this transition.

Similarly, MABE requests that the State Workgroup recommend a comparable focus on addressing the need for a much more comprehensive professional development program supported by state resources. MABE strongly believes that a robust, statewide professional development program is essential in order to equitably prepare all teachers and paraprofessionals in each of Maryland's 24 local school systems. We believe it is crucial for all Maryland school districts to have access to the training and resources necessary to enable them to deliver high quality instruction aligned with the new standards.

Thank you, again, for your dedication to this all-important work on behalf of Maryland's more than 860,000 students.

Sincerely,


Verjeana M. Jacobs, Esq.
President

VMJ:kwb

Enclosure:
MABE Comments

Maryland Association of Boards of Education

Comments on the Draft Recommendations of Maryland College and Career-Ready Standards (MCCRS) and Partnership for Assessment of Readiness for College and Careers (PARCC) Implementation Review Workgroup

Date

The following comments are organized according to the sections of the legislation which established the State Workgroup, and which were used to frame the initial set of draft recommendations.

Best Practices

Section 1(f)(2) "identify and analyze the best practices of local education agencies in the State and in other jurisdictions that are successfully implementing the Common Core State Standards and PARCC assessments"

State Workgroup draft recommendation: MSDE will continue to analyze best practices of local education agencies in the State and in other jurisdictions that are successfully implementing the Common Core State Standards and the PARCC assessments and will make the identified practices readily available to all Maryland school systems.

MABE strongly supports this State Workgroup recommendation. Specifically, MABE requests the State Workgroup to recommend that MSDE promptly establish a clearinghouse of readily available best practices; making readily available to teachers the existing best practices, and updates regarding new best practices as they are identified.

Impacts on Special Needs Students

Section 1(f)(3) "assess how the Maryland College and Career-Ready Standards and the PARCC assessments will affect students with disabilities, English language learners, and students who qualify for free and reduced-price meals"

State Workgroup draft recommendation: MSDE will work with local school districts to assess how the Maryland College and Career-Ready Standards and PARCC assessments are affecting students with disabilities, English Language learners, and students who qualify for free and reduced-price meals. MSDE will explore what additional, effective supports and strategies might be needed to close achievement gaps. MSDE will identify best practices used in local school districts and share this with all districts.

MABE supports the State Workgroups recommendation to continue to assess and identify best practices regarding the impact of the new standards and assessments on special needs students. MABE requests that the recommendation be expanded to emphasize the need to assess equity issues among and within school systems relating to student access to computer-based learning and assessment technologies both in school and in the home. These "digital divides" are of major concern and should be explicitly identified by the Workgroup as requiring assessment and the development of proposed solutions.

Curriculum Resources

Section 1(f)(4) "determine what, if any, new curriculum resources will be needed in order to fully implement the Maryland College and Career-Ready Standards"

State Workgroup draft recommendation: No recommendation – this is in the purview of local school systems.

MABE appreciates the recognition of a local school system's autonomous discretion to select and implement specific curricular resources. In this context, MABE would generally oppose a recommendation to mandate the use of a specific curricular item. However, MABE requests that the State Workgroup's report respond to the question articulated, which is to determine whether such resources will be needed. Clearly, a wide array of new curricular resources are and will continue to be needed to fully implement the Maryland College and Career ready Standards.

Many such resources are in development through the \$250 million Race to the Top (RTTT) grant. The following examples of curricular tools and resources are excerpted from MSDE's website and RTTT reports:

- **Blackboard:**
 - **Link to the MSDE's "Get on Board with Blackboard! - Race to the Top Learning Management System"**
 - **Link to MSDE's Blackboard Curriculum Resources webpage**
 - **Link to LEA Connections, the section of the Blackboard website devoted to providing access to instructional resources that Local Education Agencies (LEA) have agreed to share**
- **The Race-to-the-Top online portal that supports implementation of English/language Arts, Mathematics, STEM, and Disciplinary Literacy**
- **School transition plans to guide school staff to fully implement the Maryland Common Core State Curriculum, STEM Education, and the Educator Evaluation System**
- **The Curriculum Management System/Learning Management System (CMS/LMS)**
- **The Summer Curriculum Innovation Writing Academy, which wrote over 50 courses integrating Common Core standards, UDL, DI, electronic resources, vertical alignment**
- **The e-curriculum, and e-Curriculum Management System, which was delivered and upgraded for user friendliness and streamlining of resources and instructional delivery options**

In addition to identifying the many new curricular resources being developed, MABE requests that the State Workgroup's report also refer to the role of RTTT grant funding to support the development of new curriculum; and, recognizing the RTTT funding will soon expire, identify issues relating to the sustainability of state programs pertaining to curriculum development.

Preparing Parents and Students

Section 1(f)(5) "identify how the State Department of Education plans to assist local education agencies in preparing parents and students for the PARCC assessments"

State Workgroup draft recommendation: MSDE will work with school districts and MASC to develop ways to provide accurate and timely information to students about the new standards and testing.

MSDE will explore ways to effectively reach out to parents, including partnering with MDPTA, exploring the development of an app, and using public libraries to disseminate information.

MABE strongly supports a State Workgroup recommendation for MSDE to engage in coordinated outreach to explain and prepare parents and students for the PARCC assessments. MABE requests that the Workgroup identify specific examples of coordinated outreach with local school systems and other stakeholders, such as MASC, MDPTA, MBRT, and other organizations.

Professional Development

Section 1(f)(6) “assess the needs of teachers and principals in the area of professional development related to the implementation of the Maryland College and Career-Ready Standards, including determining:

- (i) what, if any, State and federal funding is available to supplement the funding that local governments provide toward the professional development of teachers and principals; and*
- (ii) what, if any, professional development and ongoing support from local education agencies is available to expand the use of technology as an instructional tool in the classroom”*

State Workgroup draft recommendations: Develop from survey results.

MABE strongly supports an assessment of professional development needs, which should include, but not be limited to, the information gathered through the State Workgroup’s surveys. MABE requests that the Workgroup reference the numerous specific state investments of RTTT grant funding in professional development programs, including professional development in the use of technology.

Section 1(f)(8) “begin recommending a professional development plan for the State Department of Education to implement during the 2014–2015 school year to assist local education agencies in implementing the Maryland College and Career-Ready Standards”

State Workgroup draft recommendations: MSDE will offer quality professional development opportunities – in person and virtual – for teachers in implementing the MCCR. MSDE will also explore ways to assess the quality of professional development offerings. MSDE will identify professional development opportunities for teachers in the use of technology for effective instruction.

MABE strongly supports a State Workgroup recommendation to create state plan to provide direct professional development to all educators. Specifically, MABE envisions the creation of a professional development team or teams, which would deliver direct instruction to teachers and principals on the MCCR standards and PARCC assessments. The State Workgroup has received very positive feedback on the quality of the professional development delivered by a teacher team from both Baltimore City and Washington County. To further expand the scope of access to such high quality professional development, MABE requests that the State Workgroup recommend that MSDE establish an "A" Team of 10-15 highly effective teachers to deliver day-long instruction based on this successful pilot. MABE supports this team approach to provide direct, focused, original training, rather than through a “train the trainer” model, which may dilute and confuse the message. In order to ensure statewide uniformity and quality, MSDE should provide the fiscal, technological, and administrative resources to support this effort. Lastly,

the progress of this comprehensive professional development delivery program should be reported quarterly to the State Board of Education.

Technology

Section 1(f)(7) "assess the technological readiness and the needs of the public schools for the implementation of the PARCC assessments, including what resources will be needed to teach students the necessary computer skills to take the PARCC assessments"

State Workgroup draft recommendation: MSDE will work with local school districts as they acquire technology and will work to bring equitable opportunities to students who need to develop the computer skills necessary to take the online PARCC assessments.

MABE requests that the State Workgroup fulfill this charge by assessing both MSDE and local school system technological readiness for administration of the PARCC assessments. This assessment should include references and links to existing statewide surveys and RTTT updates and reports which contain much detailed information on the issues and challenges to achieve technological readiness , and what resources and investments will be needed.

Section 1(f)(9) "recommend a plan to meet the technological infrastructure needs of public schools related to the implementation of the PARCC assessments"

State Workgroup draft recommendation: Possible recommendation regarding state funding for purchase of hardware and infrastructure.

MABE supports this recommendation, and requests that the State Workgroup recommend the development of a statewide plan, and reference other related procurement and planning initiatives. For example, the Workgroup should reference the assessment of broadband capacity which is being conducted under a separate legislative mandate; and the Workgroup should reference the investments already made by local school systems, and identify remaining unmet needs.

In addition, MABE supports a Workgroup recommendation for a stand-alone state funding initiative to support local technological infrastructure and hardware investments; toward the goal of ensuring a level playing field of equitable access of all students to comparable educational technologies. MABE requests that this request reference the initiatives in recent years to provide \$25 million for heating, ventilation and air conditioning (HVAC) projects; and to provide \$25 million for school safety and security related upgrades.

School Calendar

Section 1(f)(10) "assess how the PARCC assessments testing window will affect the normal school calendar and school schedule"

State Workgroup draft recommendation: After the first administration of the PARCC assessments, MSDE will assess how it affected the school calendar and school schedules and make recommendations for adjustment, as appropriate. MSDE will continue to look for ways to reduce the amount of time students spend taking state mandated assessments.

MABE supports the draft recommendation regarding the assessment of the first PARCC administration. However, MABE requests that the Workgroup also fully describe the calendar and schedule issues which are known, such as the assessment scheduling windows. In addition, MABE requests a description of the school scheduling issues relating to instructional responses to PARCC assessment scores, including timeliness for school administrators to make future course or remediation scheduling decisions.

Teacher Engagement

Section 1(f)(11) “assess how local education agencies are including teachers in the discussion to improve the implementation of the Maryland College and Career-Ready Standards”

MABE supports teacher engagement in the continuous improvement in the implementation of the MCCR Standards. MABE requests that the Workgroup reference the best practice reports provided by Carroll, Queen Anne’s, and other school systems for specific examples of processes which engaged teachers in developing and improving the implementation process.

Teacher and Principal Evaluations

Section 1(f)(12) “analyze the guidance education agencies have received from the State Department of Education in regards to measuring student growth in light of the new teacher evaluation system and student learning objectives”

Section 1(f)(13) “assess how the new teacher evaluation system is impacting local education agencies’ ability to implement the Maryland College and Career-Ready Standards”

State Workgroup draft recommendation: MSDE will continue to intensely monitor, analyze, assess and adjust the guidance school districts receive regarding measuring student growth in light of the new teacher evaluation system and student learning objectives and will assess how the evaluation system impacts the implementation of the MCCRS.

MABE supports the Workgroup recommendation, and requests specific references to:

- the Memorandum of Understanding (MOU) on Student Learning Objectives (SLOs) signed by major education stakeholders in June, 2014 to pledge to coordinate resources and strategies in the development of rigorous and measurable SLOs
- the development and status of the School Progress Index (SPI)
- the passage of Senate Bill 676 (2014), which mandated a 2-year delay in using PARCC assessments as evaluation tools for the purpose of making personnel decisions

High School Assessment Graduation Requirement System

Section 1(f)(14) “develop a plan to transfer from the Maryland High School Assessments in English and Algebra/Data Analysis to the comparable PARCC assessments as a graduation requirement”

MABE supports the plan adopted, in concept, by the State Board of Education in October, 2014, to not administer the new PARCC assessments in Algebra I and English 10 as graduation

requirements until the 2016-2017 school year. (Link to the [State Board of Education's approved implementation plan.](#))

On October 1, 2014, local board members gathered at the Annual Business Meeting of the Maryland Association of Boards of Education (MABE) and adopted major revisions to MABE's Continuing Resolutions, including a call for a delay of at least two years in administering the High School Assessments (HSAs) in English and Algebra as "high stakes" graduation requirement tests.

MABE believes that MSDE's initial plan to mandate, as "high stakes" graduation requirements, two new tests in the spring of 2015 in Algebra I and English 10, was not reasonable or satisfied a standard of fundamental fairness for students. MABE does not oppose administering the new HSAs, but strongly opposes linking student scores on these new tests to high school graduation. MABE has maintained that this scenario is strikingly parallel to that of teachers and principals who successfully opposed being evaluated based on never before seen student tests. The General Assembly agreed in 2014 to grant a two-year hiatus to educators, and MABE believes that the same standard of care and due diligence should be afforded to students.

Therefore, MABE has adopted a new policy statement in its Curriculum and Assessments Resolution, as follows:

"Be it resolved, that MABE supports the administration of a set of high school assessments as graduation requirements, which includes the HSAs and new PARCC assessments, following at least two years of administration, and the development of cut scores, a composite score, and appropriate interventions and alternatives. This timeframe is consistent with the prohibition enacted in 2014 on using PARCC assessment results to evaluate teachers and principals until the 2016-2017 school year."

Overarching recommendations

The State Workgroup's draft recommendations propose: "MSDE will work with school districts and other education stakeholders, including representatives from the business community, to: clarify what it means to be college and career ready, what readiness means, and define the data necessary to assess whether students are college and career ready."

MABE certainly endorses the stated commitment to this ongoing work. Therefore, MABE requests that the State Workgroup report provide further description and clarification of the relationship between the MCCR standards and PARCC assessments, and the 2013 legislative mandate to develop a college and a career readiness assessment and instructional program.