

**Maryland Association of Boards of Education
Comments to the
Workgroup on the Assessment and Funding
of Maryland's School Facilities
November 3, 2021**

The Maryland Association of Boards of Education (MABE), on behalf of all 24 local boards of education, appreciates the opportunity to provide comments on the recently completed statewide school facilities assessment and other funding and policy issues.

Local boards have long understood that the conditions of classrooms and the physical amenities of our schools are integrally related to reforms and increased funding for operations. Today, Maryland is benefitting from the parallel launches of the Blueprint for Maryland's Future Act and the Built to Learn Act, landmark initiatives that demonstrate the State's commitment to educational excellence.

MABE also recognizes the value of a high quality state assessment of the condition, and therefore critical needs, of each school facility in which teaching and learning occur. Such an assessment should provide the comprehensive data to inform decision-making in each local school system, for each local government, and for the Governor and legislature as funding priorities are adopted. The 21st Century School Facilities Act of 2018 required the Interagency Commission on School Construction to adopt new educational facilities sufficiency standards and facilities condition index (FCI). The goal to create uniform standards and measures for evaluating the physical and educational attributes of Maryland's 1,400 public schools. Importantly, the FCI is intended to accurately determine the relative physical conditions of school facilities by calculating total repair costs and total replacement costs. Such an index must rely on consistent, high quality data.

Unfortunately, MABE has identified significant concerns with the implementation and outcomes of the recently completed statewide school facilities assessment. Notwithstanding the diligent work of the staff of each local school system, the staff of the Public School Construction Program, and the contractor and subcontractors performing the assessments, the outcome appears to be fatally flawed, both in terms of quality and utility in fulfilling the mission to provide information on which local and state school facility funding decisions can be made.

Specifically, based on extensive input from local school system staff, MABE must emphasize that the concerns with the quality and consistency of the assessments conducted by the contractor and subcontractors are so pronounced that MABE must object to utilizing the results in developing the FCI or other purposes relating to funding prioritization.

Local school systems report the following serious concerns regarding the assessments:

- The contractor's and subcontractors' evident lack of adequate preparation to conduct site assessments, including the lack of floor plans, lack of consistent measurements of conditions, and inadequate time to assess entire facilities. These issues led to inordinate

investments of school system staff time, and the realization that such deficiencies would negatively impact the quality of the final assessment.

- The failure to utilize the most accurate student enrollment data and projection methodology available. School systems report that the assessments did not consistently utilize 2019 as opposed to 2018 enrollment data, and utilized the straight line methodology as opposed to the cohort survival methodology. School systems believe that the cohort methodology long employed by the Maryland Department of Planning and relied on by school systems for the crafting of Educational Facilities Master Plans, much more accurately reflects variations in enrollment by grade level and therefore more accurately projects building capacities and needs.
- The miscalculation of the useful life of systems. School systems report that the assessment data is seriously flawed based on the averaging of newer components with much older components. This practice has demonstrably skewed assessment results for facilities.
- The failure to ascertain the actual operational functionality of systems. Many systems were not operational during the on-site assessments (which occurred during school closures and summer months). School system staff was not queried on performance or conditions, and the reliance on static images of documentation of the age and maintenance history of a system has generated assessment results that do not reflect operational conditions.

The current statute is of concern because it presumes the completion of a high quality state school facilities assessment. Under the law, the IAC is to adopt regulations no earlier than May 1, 2022, to establish the use of facility assessment results in annual school construction funding decisions beginning no earlier than FY 2023. MABE, therefore, respectfully requests that this workgroup recommend that the assessment results not be employed in this manner or on this timeline.

MABE greatly appreciates this workgroup's investment of time, energy, and expertise in pursuing ways to continuously improve the governance and administration of the State's enormous investment in school construction, major renovations, and systemic projects. Our public school facilities are the learning environments in which our children's futures are formed, and each of our nearly 1 million students are counting on us.

Please direct any questions or concerns regarding these comments to MABE's Director of Governmental Relations, John R. Woolums, Esq., at jwoolums@mabe.org or 410-841-5414.