COMMENTERS	COMMENTS	PROPOSED ACTION	RATIONALE
Rachel London, Director, Children & Family Policy Maryland Developmental Disabilities Council Rachel London RachelL@md-council.org	**6/14/12 (email-letter)** The Maryland Developmental Disabilities Council (DD Council) is an independent, public policy organization that works to improve policies, programs and practices that support people with developmental disabilities and their families in our communities. The DD Council is led by people with developmental disabilities and their families and it is from that perspective that we submit the following comments in support of the proposed revisions to COMAR regarding UDL. UDL is a framework and set of principles that provides all students equal opportunity to learn. With such a diverse group of students in today's schools, educators are challenged to teach a variety of students with a variety of different needs, skills, and interests. The integration of UDL guidelines and principles will support these educators to expand the accessibility and flexibility of the curriculum to meet the needs of all learners, including those with disabilities. Both the Individuals with Disabilities Education Act (IDEA) and No Child Left Behind (NCLB) recognize that all students must make progress in the general education curriculum. NCLB holds schools, counties, and states responsible for demonstrating student progress. By changing the way the general education curriculum is designed, UDL helps educators meet the requirements of these laws. Student performance increases as all students acquire greater knowledge and demonstrate progress when UDL is fully embraced and implemented. The regulations about UDL are a critical step towards implementing the recommendations of the Maryland UDL Task Force and ensuring that all students must make progress in the general education curriculum, therefore, the DD Council supports the adoption of these regulations as written, without amendments.	N/A	Positive feedback provided with no requests for change.

ATTACHMENT II

COMMENTERS	COMMENTS	PROPOSED ACTION	RATIONALE
David Wizer, Ph.D. 410.704.6268 (office) /4227(fax) Professor & Chair Dept. of Educational Technology & Literacy Towson University Towson, MD 21252 e-mail: wizer@towson.edu	**6/19/12 (email)** I write you today in support of the proposed COMAR 13A.03.06.01-.07 regarding Universal Design for Learning. This is an outstanding idea and matches well with federal regulations. More importantly this is a superb way for teachers to organize instruction and teaching to reach a diverse group of student learners. I support UDL as it relies on seamless technology integration into the pK through college classroom. However, the technology can vary widely from the high technology to low or no technology. In summary, UDL is a very effective model to enhance learning for students of all ages. Please, be assured there are a wide array of educators and scholars at the university who like me fully support the new UDL regulation.	N/A	Positive feedback provided with no requests for change.
Dr. Nancy Shapiro, Associate Vice Chancellor for Academic Affairs and Special Assistant to the Chancellor for P-20 Education, University System of Maryland Sent by: nshapiro@usmd.edu	**6/20/12 (email)** Barbara Ann Gill <bgill@umd.edu I don't know much about UDL, but my general reaction is positive. It aligns nicely with other education initiatives. I do have several questions which may not be the response you seek. How will UDL effect individual student IEP — will one replace the other? Is there a risk that the UDL approach may be perceived as resulting in relaxed rigor? If yes, how will we, in our support of UDL, respond? I am interested in learning more. Thanks.	None	Positive feedback provided. Had questions about UDL in general, but not specifically related to the COMAR regulations.

COMMENTERS	COMMENTS	PROPOSED ACTION	RATIONALE
Ricki Sabia at resabiandss@yahoo.com On behalf of Nancy Forsythe and Michael McLaughlin, co-chairs Maryland Down syndrome Advocacy Coalition (MDAC)	**6/25/12 (email-letter)** The Maryland Down syndrome Advocacy Coalition (MDAC) is a partnership of Down syndrome organizations across the state, advocating on the behalf of individuals with Down syndrome and their families. MDAC enthusiastically supports the proposed Universal Design for Learning (UDL) regulations and requests that the Maryland State Board of Education take final action to adopt them, without amendment. Implementation of UDL will allow achievement across the entire spectrum of learners as Maryland school systems transition to the Common Core Standards and will provide a measure of social justice in education not seen before. The next two years are the perfect time for the regulation's requirements to take effect because every school system will be making significant instructional and assessment changes in accordance with the Common Core Standards. Using the UDL framework as a guide, school systems can make these changes in a way that benefits all students and teachers. UDL implementation will make the transition more effective, efficient and equitable than waiting until after changes have been made to address the diversity of students in today's classrooms.	N/A	Positive feedback provided with no requests for change.

COMMENTERS	COMMENTS	PROPOSED ACTION	RATIONALE
MDAC (continued)	The UDL regulations are an important step towards implementing the recommendations of the Maryland UDL Task Force that were accepted by the State Board of Education on April 26, 2011. In addition, the Maryland ESEA Flexibility Request, which was recently approved by the U.S. Department of Education, states that UDL will be used for the transition to Common Core Standards and contains a lengthy discussion about Maryland's commitment to UDL. The UDL regulations are necessary to insure that this commitment is realized in every school system in the state. We appreciate the efforts of MSDE and the Maryland State Board of Education in bringing the future of education to Maryland. Universal Design for Learning will help ensure Maryland's national leadership position in education. But more importantly, it will offer better futures and brighter lives for all of our citizens. Please contact Ricki Sabia at resabiandss@yahoo.com with any questions. Sincerely, Nancy Forsythe and Michael McLaughlin, MDAC co-chairs		

COMMENTERS	COMMENTS	PROPOSED ACTION	RATIONALE
Clara Floyd, President MSEA dspriggs@mseanea.org on behalf of Clara Floyd	**June 29, 2012 (email-letter)** The Maryland State Education Association (MSEA) is submitting this statement of support with amendments of the proposed regulations promoting the incorporation of the principles of Universal Design for Learning (UDL) into curriculum design in each school jurisdiction throughout the state. UDL is a solid, research-based framework which supports student achievement across the spectrum by providing more strategies for delivering instruction. It is considered a best practice model and the next generation of differentiated instruction. Including the principles of this framework into overall curriculum design on the front end also will impact instructional delivery, the selection of curriculum materials and technology, and the development of assessments, providing critical supports to students that are varied and appropriate to learning strengths, needs, and interests. In today's increasingly diverse classrooms, UDL recognizes and addresses the premise that different students may need different kinds of instruction. It builds on the idea that successful learning looks different across subjects and assignments, stages of development, and among student bodies. UDL also provides a framework for educators to meet the diverse academic needs of all students as required by the federal mandates of No Child Left Behind, including adequate yearly progress benchmarks, the Individuals with Disabilities Education Act, and schools with full inclusion classrooms.		

COMMENTERS	COMMENTS	PROPOSED ACTION	RATIONALE
MSEA (continued)	Whereas the principles and tenets of UDL form a well-intended framework, the regulation's proposed implementation as set forth in the guidelines of "A Route for Every Learner, 2011" gives MSEA cause for concern. The costly demands of many of the initiatives outlined in the report would have a demanding fiscal impact on our local school systems, which already face budgetary challenges as the economy continues to recover.	None	Integrating UDL principles and guidelines during the curriculum development or revision process does not require additional funding.
	In addition to the unfunded mandates, we are concerned that there is an unrealistic timeline for the implementation of this new instructional paradigm. It is unclear whether or not all subject areas outside of the Common Core Math and English Language Arts would need to retro-fit curriculum, instructional materials, professional development, and instruction itself to UDL by 2014. Therefore, the regulation needs to be clarified. Furthermore, local school systems would have the unattainable task of assuring that all past curriculum has been updated to include UDL principles by 2014. MSEA suggests that this timeline is unrealistic for an effective implementation conducted with fidelity, and recommend that the timeline be extended.	None	The regulation does not contain unfunded mandates for local school systems. There was no reference made to retro-fitting or revising existing curriculum. Any newly developed or revisions in curriculum beginning in the 2013-2014 school year should use UDL guidelines and principles.
	Much has changed since the Task Force was commissioned in May 2010 and the report published in March 2011—most notably the extension of the pilot teacher evaluation system—which raises a final concern. The proposed regulations appear to mandate the implementation of this 70+ page report just as Common Core, PARCC assessments, and the new teacher evaluation framework go from piloting and field testing to live, high stakes implementation. MSEA wants to make certain that we have an evaluation model that is validated and reliable.	None	The regulation does not mandate implementation of the 70+ pages of the report. It is requiring that as local school systems move forward in their reform efforts that UDL principles and guidelines be applied at the onset of the decision making process in regard to the development and provision of curriculum, instructional materials, instruction, professional development and student assessment.

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MSEA (continued)	We also want to make certain that educators and evaluators are provided ample time for professional development, particularly for the implementation of the teacher evaluation system. Therefore, it is unfeasible to mandate that UDL principles be demonstrated by teachers prior to them receiving training. MSEA supports the UDL framework with a request for clarification on the issues of funding and phased-in timelines. We also request that the language below (.03 Incorporated by Reference) be stricken from the regulation (Title 13A Subtitle 03 General Instructional Programs Chapter 6-Universal Design for Learning). The "A Route for Every Learner, 2011" report should be used as a guideline, rather than as a mandated policy. ~~**".03 Incorporated by Reference**~~ ~~A framework of UDL principles and guidelines as set forth in "A Route for Every Learner, 2011" is incorporated by reference."~~ We can only ensure that all students will reap the benefits of the UDL framework when we ensure a comprehensive and equitable roll-out of the UDL tenets across the state. Funding and appropriate timelines allow the opportunity for all school systems to be on the same playing field. With proper implementation, including materials, technology, and resources, and professional development, UDL can foster more successful school communities that include team-building among instructional staff and greater collaboration between administration and faculty to meet the needs of students. We appreciate the work of the Task Force as well as that of the State Board as it considers these regulations.	None	There is currently an online UDL module developed by MSDE as part of the Educator Effectiveness Academy that is to be shared with, and available to all teachers and administrators in the State. Continuation of professional development incorporating UDL will be ongoing in the Educator Effectiveness Academy work. To provide options for student learning does not always require a technology solution. The framework of UDL principles and guidelines is what is incorporated by reference.