

Charlene Necessary -MSDE- <charlene.necessary@maryland.gov>

FW: Maryland Department of Education Approves Secret HPV Vaccine Marketing Program Targeting 11 and 12 Year olds in State School Classrooms with Inaccurate, Incomplete, and Misleading Information

1 message

josh.mazer@wfafinet.com <josh.mazer@wfafinet.com> To: charlene.necessary@maryland.gov Cc: stateboard.msde@maryland.gov Mon, Sep 24, 2018 at 12:01 PM

Dear Ms. Necessary- could you please distribute this letter with attachments and links below, to the School Board members in preparation for my public comments. Thank you! Josh Mazer 301-996-8919.

To The Maryland State Board of Education:

Please compare the 2017 and 2018 secret Maryland Department of Health letters (attached above) distributed to target market the HPV shot to 11 and 12 year olds in state school classrooms. Dr. Howard Haft, Deputy Director, MD DOH has acknowledged in writing that the changes made were a direct result of my input to MD DOH. Dr. Haft writes:

"Mr Mazer

Thank you for your comments on the phone last evening.

As promised I am sharing the most recent version of the letter to School Superintendents on HPV vaccine that includes the reference to sexually transmitted disease as you suggested."

The changes in the 2018 letter include: removing the word "critical" in sentence one; removing the word "under" in sentence one; adding "sexually transmitted disease" in paragraph one; adding "according to the CDC and ACIP" in paragraph two; and switching the word "important" in place of "imperative."

This situation is a re-run of the FluMist debacle. The Maryland State Board of Education placed Maryland school children at risk with the ineffective FluMist program. The Maryland State School Board is now placing Maryland school children at risk by approving the ill-advised, deceptive, secretive HPV vaccine marketing program in Maryland schools.

Please note that in Dr. Haft's op-ed published 9-7-2018 op-ed published in The Capital Gazette (please see below for link to article), he fails to address the US Court of Federal Claims Sept 2017 decision affirming that the HPV vaccine caused the fatal arrhythmia that caused the death of Sparks, Maryland resident Christina Tarsell. Dr. Haft does acknowledge that his department received over \$92mm to promote the HPV, including accepting funds during the time period that the Maryland DOD was actively involved in covering up the Tarsell decision.

https://mail.anorale.com/mail/u/17212=58506h30324.iou=pt&coarch=all&normthid=thread_PL301612502070138067447%470 men_PL3016125052035723050224ei 1/3

The program to use Maryland state schools as a marketing avenue for Merck's HPV vaccine was initiated without input of parental stakeholders. The program is being conducted in a deliberately secretive manner. The changes in the 2017 letter compared to the 2018 letter demonstrate that this program is being ineptly administered. Using our schools to target market the HPV vaccine to 11 and 12 year old children is bad public health policy. The Maryland DOE must publicly renounce this effort and disclose an action plan to ensure Maryland school children are never exposed to this type of in school based, secretive pharma marketing campaign ever again.

http://themarylandcrabs.com/2018/08/23/the-hpv-controversy-are-md-schools-pushing-it-and-is-it-safequestions-abound-e-106/

http://www.capitalgazette.com/opinion/columns/ac-ce-column-mazer-20180814-story.html

http://www.capitalgazette.com/opinion/columns/ac-ce-column-haft-20180908-story.html

http://www.capitalgazette.com/opinion/columns/ac-ce-column-tarsell-20180907-story.html

Respectfully-

Josh Mazer Annapolis, Md 21409 301-996-8919

To stop receivingmarketing emails from:

 An individual financial advisor at Wells Fargo Advisors Financial Networks: Reply to one of his/her emails and type "Remove" in the subject line.

Wells Fargo and its affiliates click here

Neither of these actions will affect delivery of important service messages regarding your accounts that we may need to send you or preferences you may have previously set for other email services.

For additional information regarding our electronic communication policies, visit our electronic communications policies for additional information

Investment products and services are offered through Wells Fargo Advisors Financial Network, LLC (WFAFN), member FINRA/SIPC, a registered broker dealer and nonbank affiliate of Wells Fargo & Company. 1 North Jefferson, St. Louis, MO 63103. WFAFN uses the trade name Wells Fargo Advisors. Any other referenced entity is a separate entity from WFAFN.

This email may be an advertisement for products and services.



MARYLAND Department of Health

Larry Hozan, Gon mor + Boyd Ruth of H. Lt. Commun + Donnis Schrader, Secretary

August 2, 2017

Dr. Jack R. Smith Superintendent Montgomery County Public Schools 850 Hungerford Drive Rockville, MD 20850

Dear Mr. Smith,

Set W in mins

- f. J*

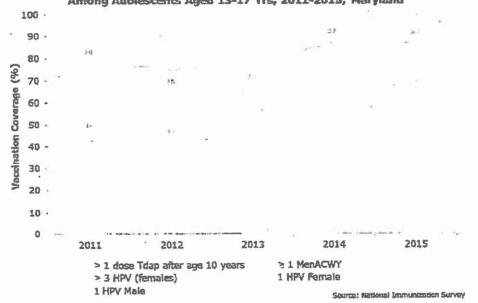
A M22 1 46

1.

" ... bl

We are writing to ask for your help in addressing the critical public health issue of under-vaccination of Maryland's adolescents against Human Papillomavirus (HPV). According to the Centers for Disease Control and Prevention (CDC), about 14 million people, including teens, become infected with HPV each year, posing a significant public health risk. HPV is a common virus that can cause several types of cancers affecting men and women, including cervical, penile, anal, and throat cancers.

A preventive measure exists to protect against these HPV-related cancers. The HPV vaccine is recommended for preteen boys and girls at age 11 or 12 because it provides protection *before exposure* to the virus and produces a more robust immune response during the preteen years. However, current Maryland data shows that vaccination rates for Tdap and meningococcal, vaccines recommended for the same age group, are considerably higher than those for HPV (>32% higher than HPV rates). This gap in coverage indicates missed opportunities to vaccinate boys and girls against HPV at the same time as other routinely recommended adolescent vaccines.



THE

J. 16 1. 16 1. 1

Estimated Vaccination Coverage With Selected Vaccines Among Adolescents Aged 13-17 Yrs, 2011-2015, Naryland During the upcoming 2017 back to school senson, it's imperative to maximize the opportunities for age eligible children to initiate or complete the HPV vaccination series while they are visiting providers to obtain *school-entry required vaccinations* (Tdap and meaingococcal) or for other services. As the Montgomery County Schools Superintendent, you have the capability to influence parents and schools in your county on this issue. According to the 2015 CDC WONDER population estimates, there are 13,248 females and 13,796 males in Montgomery County that are of eligible age, 11-12 years old, to receive the HPV vaccine.

Please join this statewide effort to increase HPV vaccination coverage by supporting parent education through distribution of trusted educational material^{*} to parents and guardians through schools in your jurisdiction. Schools may distribute educational information by:

6	Emailing fact sheets to parents or printing facts sheets to distribute along with school-entry required vaccination educational materials Distributing printed fact sheets at Back to School events, PTA meetings, or other events held at schools	Fact Sheet for Parents (English) Fact Sheet for Parents (Spanish)
0	Emailing PSAs (30 second videos) to parents	30 second PSA video about HPV (English)
o,	Displaying PSA videos at Back to	 Click on the "Adolescent" tab
	School events, PTA meetings, or other events held at schools	 Scroll for 3 HPV vaccine PSAs
	other events held at schools	30 second PSA video about HPV (Spanish)
		 Click on the "Spanish" tab
		 Scroll to the first video

* All informational materials developed by the Centers for Disease Control and Prevention.

Thank you for all that you do to improve the health of Maryland children, and for your consideration of joining this very important effort to prevent cancer by increasing the uptake of the HPV vaccination.

- 1.dans

17')

Dennis R. Schrader Secretary Maryland Department of Health

See.

Jinlene Chan, M.D., M.P.H. Acting Deputy Secretary, Public Health Services Maryland Department of Health

201 W. Per.

et also se la la la construcción de la construcción de



Larry Hogan, Governor · Boyd K. Rutherford, Lt. Governor · Robert R. Neall, Secretary

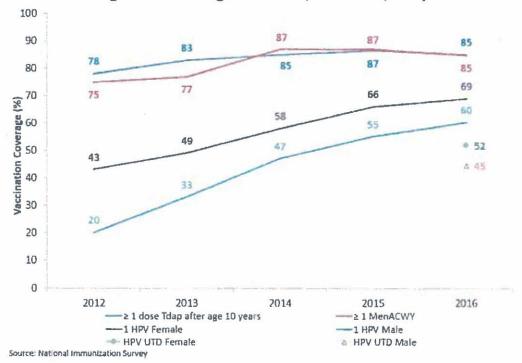
June 15, 2018

Superintendent County Public Schools

Dear,

We are writing to ask for your help in addressing the public health issue of vaccination of Maryland's adolescents against Human Papillomavirus (HPV). According to the Centers for Disease Control and Prevention (CDC), about 14 million people, including teens, become infected with HPV each year, posing a significant public health risk. HPV is the most common sexually transmitted disease in the United States. HPV can also cause several types of cancers affecting men and women, including cervical, penile, anal, and throat cancers.

A preventive measure exists to protect against these HPV and-related cancers. According to the CDC and the Advisory Committee on Immunization Practices (ACIP) the HPV vaccine is recommended for preteen boys and girls at age 11 or 12 because it provides protection *before exposure* to the virus and produces a more robust immune response during the preteen years. However, current Maryland data shows that vaccination rates for Tdap and meningococcal vaccines, recommended for the same age group, are considerably higher than those for IIPV (≥40% higher than HPV rates). This gap in coverage indicates missed opportunities to vaccinate boys and girls against HPV *at the same time as other routinely recommended adolescent vaccines*.



Estimated Vaccination Coverage With Selected Vaccines Among Adolescents Aged 13-17 Yrs, 2012-2016, Maryland

201 W. Preston Street · Baltimore, MD 21201 · health.maryland.gov · Toll Free: 1-877-463-3464 · TTY: 1-800-735-2258

During the upcoming 2018 back to school season, it's important to maximize the opportunities for age cligible children to initiate or complete the HPV vaccination series while they are visiting providers to obtain *school-entry required vaccinations* (Tdap and meningococcal) or for other services. As the Allegany County Public Schools Superintendent, you have the capability to influence parents and schools in your county on this issue. According to the 2016 CDC WONDER population estimates, there are 662 females and 744 males in Allegany County that are of eligible age, 11-12 years old, to receive the HPV vaccine.

Please join this statewide effort to increase HPV vaccination coverage by supporting parent education through distribution of trusted educational material^{*} to parents and guardians through schools in your jurisdiction. Schools may distribute educational information by:

•	Emailing fact sheets to parents or printing facts sheets to distribute <i>along</i> <i>with</i> school-entry required vaccination educational materials	Fact Sheet for Parents (English) http://www.cdc.gov/vaccines/parents/diseases/tcen/hpv- indepth-color.pdf
•	Distributing printed fact sheets at Back to School events, PTA meetings, or other events held at schools	Fact Sheet for Parents (Spanish) http://www.ede.gov/vaccines/parents/diseases/teen/hpv- indepth-color-sp.pdf
•	Emailing PSAs (30 second videos) to parents	30 second PSA video about HPV (English) https://www.cdc.gov/ncird/media/resources/index.html
	Displaying PSA videos at Back to	Click on the "Adolescent" tab
	School events, PTA meetings, or other events held at schools	Scroll for 3 HPV vaccine PSAs
	events neit at schools	30 second PSA video about HPV (Spanish)
		https://www.cdc.gov/ncird/media/resources/index.html
		 Click on the "Spanish" tab
		 Scroll to the first video

* All informational materials developed by the CDC.

Thank you for all that you do to improve the health of Maryland children, and for your consideration of joining this very important effort to prevent cancer by increasing the uptake of the HPV vaccination.

Howard M. Hafl, MD, MMM, CPE, FACPE Deputy Secretary, Public Health Services Maryland Department of Health



OTHER VOICES

Opinion -

Gendesil was linked to my datashteris datah

H

and down of the set

Aught for all

HPV program is a valid effort to address a public health threat Theorem and the set of t

State Board of Education Testimony September 25, 2018 MSEA Testimony re: COMAR 13A.12.04.03 Superintendent Doug Prouty

Good morning President Hartings, Vice President Iszard, and members of the board. I am Doug Prouty, a 10th grade English teacher serving as the vice president of the Maryland State Education Association, representing 74,000 educators across Maryland.

We urge you to oppose the addition of a new category for certification of superintendents which you will consider today. You are receiving a letter today from the Maryland Coalition on Equity which echoes the concerns expressed by MSEA president Cheryl Bost at your meeting last month. It is worth noting that amongst the numerous co-signers to this letter are the Maryland Association of Boards of Education and the Public Schools Superintendents Association of Maryland. The Boards of Education and their superintendents of school systems across Maryland are opposed to this idea, along with Maryland's educators, civil rights groups, and public education advocates. We all feel that it is vitally important that local superintendents have teaching experience. We understand that a superintendent who qualifies for the position through the "Extraordinary Career Leadership Certification" would start the job without credibility in the eyes of those she or he would lead.

Do not underestimate the symbolic message you will send if you adopt this revision to COMAR. A public school system is not the same as a business or branch of the military, despite the fact that each has processes of procurement, hiring, payroll, and management. Teaching children is not the same as manufacturing and selling smart phones or defending our country. Even within the teaching profession, there are notable differences which we acknowledge in our certification and training. I can tell you for a fact that while I can teach 15 year olds how to read, think, and write about literature, I could not lead a kindergarten classroom or even teach my students Calculus or Physics.

Leading a public school system requires a distinct set of skills, knowledge, and abilities which only come through experience in the classroom, leading a school and working in the administration of a school system. Those who have committed their lives to public education must be able to believe that their leader shares that commitment and have evidence thereof in that person's background. Public education is not just another profession. It is founded in the belief that all students can learn and that all students deserve an equal opportunity to do so. It is founded in the willingness to see each student as an individual and adapt our work to meet the unique needs of each of the individuals we work with each period or day.

Please do not send the message that anyone can do or lead this work. Anyone cannot. Please listen to educators who care for and about our students every day and do not adopt this new language which will not benefit, and could in fact harm, public education in Maryland. Thank you for your time and attention.

Unidentified Teacher

Unidentified Elementary School

Unidentified County, Maryland

* Teacher requests anonymity due to fear of retaliation*

"Yea well the stats are not accurate! It's double or triple those damn stats because they intentionally make up their own forms to use instead of using the actual referral forms."

"Kids and teachers are terrified and tormented. The environment is causing PTSD. Teachers are on medications and in therapy to try to deal with the school environment."

Unidentified-Teacher

Unidentified Elementary School

Unidentified County, Maryland

* * Fears retaliation for reporting**

Constant fear is not how kindergarten students should feel when attending school. In my classroom my students are put in danger repeatedly by a fellow classmate. This classmate has physically thrown chairs, supplies and personal items at other students during episodes of extreme aggression.

On multiple occasions this student has used objects to physically strike other students. On one incident this child picked up a marble notebook and hit another student across the face. On another occasion this students picked up scissors and threw them directly at my face scraping my temple while I moved away.

On a daily basis, I am forced to place myself in harm's way to protect my other students from flying objects and physical attacks. I have had to teaching curriculum on hold to instruct my students how to respond to code words in order for them to evacuate my classroom for their safety.

Administration has responded and removed this student multiple times a day. Always returning him again to my classroom where we wait on egg shells for the next outburst. These behaviors have been documented since September, he has received multiple in school isolations and one day suspensions.

Long term suspension was warranted only after I was physically attacked to the point where I was unable to call for help. I was charged by this student and pinned against a wall where he repeatedly slammed his upper body and head into my lower abdominal area. This happened repeatedly while my other students watched in horror.

After several hits to the stomach this student lost his footing and fell to the floor allowing me to move around him and scream to another teacher for assistant. The student ran from my classroom and continued to run out of the school building.

This incident resulted in a five day out of school suspension. Following this suspension the student was returned to my classroom with no plan or procedure in place in hopes to avoid another incident like this from occurring. Because of federal guidelines and lack of parents' involvement, we have been attempting to assess and determine if this student qualifies for a IEP since September.

This student is only accessing a maximum of 60 minutes of instruction during a six and a half hour school day. We are now awaiting a meeting to share assessment results to determine a disability.

Unidentified Teacher

Unidentified School

Maryland School System

Anonymity Requested due to fear of retaliation

Serving as an instructional coach, I have had several teachers share their concerns about safety and discipline issues. Their administration has requested that they use an alternate reporting method as opposed to the formal reporting methods to document student behavior and discipline. Therefore, these schools, all known to have some of the most significant behavior and safety issues in the county, are not being accurately represented in the data. The data used to make important discipline decisions.

I have firsthand knowledge of teachers, including me, who have been put under administrative pressure to not report or pursue criminal charges for injuries that occurred following student assaults. Some of these assaults have resulted in life altering impacts and permanent disabilities to the teachers.

I know of at least one SRO who has chosen to resign from his position as a result of being pressured by administration to suppress data and investigations related to student offenses.

September 25, 2018

Dr. Justin Hartings, president Ms. Stephanie Iszard, vice president Maryland State Board of Education 200 West Baltimore Street Baltimore, Maryland 21201

Dear Dr. Hartings and Ms. Iszard:

The Maryland Coalition on Equity brings together education stakeholders working to make a positive impact on public education in Maryland. We believe education equity is having appropriate academic, social, and economic supports to ensure all students have access to resources and educational rigor throughout their academic careers. Representatives from numerous organizations meet monthly to share ideas and work collaboratively on initiatives addressing areas of inequity. Our collective work includes testimony and feedback to the General Assembly and State Board of Education (SBOE) with the intent to ensure policies, funding, and other public education initiatives are consistent with principles of equity. We are writing to you to express our strong opposition to proposed changes to COMAR 13A.12.04.03 *Superintendents* recently discussed by the SBOE and the Maryland State Department of Education. Based on discussions held by the SBOE at its last meeting, it is our understanding that the SBOE is considering changing these regulations to allow for a one-year term for a superintendent in a local school system and to provide a section titled "Extraordinary Career Leadership Certification" which removes teaching and administrative experience as hiring criteria.

Maryland public schools have a long history of ensuring high quality teachers, administrators, and central office administration, including the office of superintendent. The high quality of all personnel in a school system creates a strong foundation for the success of our schools.

It is critical that local superintendents be strong instructional leaders in order to provide educational guidance and make critical decisions that affect classroom instruction and procedures. We believe local superintendents must have teaching and administrative experience in the field of education. The absence of this experience not only deprives superintendents of credibility within the workforces they must lead, but also means they lack an authentic, experience-based sense of how their decisions will impact classrooms. The consideration to reduce the criteria for those becoming superintendents is counterintuitive when at the same time the Kirwan Commission is considering recommendations to increase the certification requirement of teachers and administrators.

The one-year term provision of the proposed regulations is also highly problematic. Consistency and stability from the superintendent's office, with steady oversight and guidance from local boards of education, helps to build a vision and coordinate work within a local district. A one-year term—which would really be July 1 through January 31 based on notification and hiring timelines—provides a short timeframe for any candidate to successfully get initiatives in place and hire top-level staff, while simultaneously devoting time to being mentored on any of the pillars as presented by the State Board. This one-year term requiring on-the-job mentoring creates an unimaginable uphill battle for any candidate to be successful, and therefore would be a disservice to students and educators.

Dr. Justin Hartings Ms. Stephanie Iszard Page Two

We've seen the detrimental effects of high levels of churn in top leadership—which all too often has happened in school systems that serve our most diverse student populations. Student learning is negatively impacted when there are constant starts and stops with curriculum, services, and overall decision-making about how to move school system and student success forward. The greatest barriers to success in these circumstances include: the ability to hire quality at-will deputies and top central office staff knowing they may only be employed for one year; designing and initiating a vision of work; creating a long-term view in budgeting, programs, and hiring; building relationships with communities, parents, employees, and elected officials; and, the expense to a school system of conducting a hiring search on a yearly basis. The turmoil inherent in superintendent turnover will be exacerbated by the proposed regulations and will be detrimental to the quality of education provided to students.

In order to maintain strong criteria for the position of superintendent to be the instructional leader of the caliber our students deserve, we strongly oppose removing teaching and administrative experience as part of the criteria and the addition of granting a one-year term for superintendents.

ORGANIZATIONS	REPRESENTATIVE/POSITION
maryland state education association	Cheryl Bost, President
PSSAM or Public School Superintendents Association of Maryland	Dr. Daniel Curry, President Renee McGuirk-Spence, Executive Director
MARYLAND ASSOCIATION OF BOARDS OF EDUCATION	Chuck McDaniels, President Francis Glendening, Executive Director
Greater Baltimore Urban League	Sharnice Barnett, Director of Programs
Maryland Education Coalition	Rick Tyler, co-chair Sharon Rubenstein, individual, Communication Education Advisor
ACLU Maryland	Bebe Verdery, Executive Director, Education Reform Project

Disability Rights Maryland	Bob Berlow, Senior Attorney
FOR CHILDREN AND YOUTH	Shamarla McCoy, J.D., Education Policy Director
Arts Education in Maryland Schools Alliance	Lori Snyder, Executive Director
CASA	Maritza Solano, Director of Education
Adv cate Maryland	Karleen Spitulnik, State Leader
everychild. one voice.	Marla Posey-Moss, Vice President for Advocacy
MOST NETWORK	Ellie Mitchell, Director
NAACP	Barbara Dezmon, Education Chair
Parent Advocacy Consortium (PAC)	Sarah R. Davis, Founder
Let Them See Clearly	Catherine Carter,Founder
SCHOOL SOCIAL WORKERS IN MARYLAND	Patricia K. Childs, Representative

Nicole Landers, RN, mother, Assistant Director of Pediatric Nursing, Founder Parent2Parent Network

Introduction: Good afternoon, Madam Secretary, it is a great honor to meet you.

I come to you today brokenhearted. As a mother, nurse and advocate I can no longer bear the pain of those who call upon me daily. However well intended, the 2014 discipline guidelines are dismantling our schools, wounding our children and handcuffing our educators. We have reached a school violence crisis, unless action is taken now, I fear we risk losing a generation in ways we simply cannot comprehend.

As a mother: I have watched repeated harm to my children

- My 5th grade daughter: You have heard today. Our society has laws against such acts. I am told her perpetrator has "rights", but what of my daughter's rights? Since when did schools supplant law?

- My 4th grade son: Thrown into mud, struck in the face, threatened with beatings and electrocution became suicidal at the tender age of nine. The offending student, I am told, has "rights" No discipline issued, this student remains a daunting classroom presence to him daily.

- My 11th grade son: Threatened for reporting a knife wielding student. The school protected the perpetrator's "rights" while denying my son's. Per administration, my son "misunderstood" the student's intent. When I took my son to the local precinct to report the threat, 2 officers shared these words I will never forget:

"Ma'am, the schools do not typically report events to us. We don't really know the things that go on in there. So please teach your kids to call 911. Instead of going to the office for help, walk outside and dial 911. That is really the only way we can come in. If we come, then we can document the event."

In all these cases the dangerous students, lacking intervention, remain in school and causing harm to others to this very day!

As a pediatric nurse: I watch my fragile patients placed at great risk

-During one recent school visit I witnessed five staff attempt to contain a kindergartner assaulting his peers. The student struck the staff repeatedly. Tolerating the beatings, they explained:

"Administration will not help us. We will get in trouble if we send him to the office. It's like this every day!"

This event within steps of my fragile patient, no interventions in sight, we are left to ponder when this unruly child will pull the breathing tube from my tiny patient's throat.

As an advocate: My organization receives countless pleas for help

Parents, teachers and staff contact us frustrated, without hope and in need of crisis intervention daily. They tell us stories of fights, bullying, assaults and more! If we worked round the clock we could not possibly help them all! Teachers report being asked to falsify discipline records, not report assaults against them and are even subject to permanent injury. They feel powerless to protect themselves or their peaceful students. The words of one desperate teacher depict it best:

"Kids and teachers are terrified and tormented. The environment is causing PTSD. Teachers are on medications and in therapy to try to deal with the school environment."

Today, I offer the empirical evidence of souls disparaged by regulations which place greater value on reduced suspensions than on human lives. Exclusionary discipline is not a factor of discrimination. Negative behavior leads to exclusion. Our students and educators deserve better than facing daily fear going to school. For my children, and the children of a nation, Madam Secretary, we look to you for help . I thank you very much for your time.

1

Good Morning!

Today I am here representing PSSAM (Public School Superintendent's Association of Maryland). We would like to express our strong opposition to proposed changes to COMAR 13A.12.04.03 *Superintendents*. We understand you are considering changing these regulations to allow for a one-year term of a superintendent in a local school system, and to provide a section titled "Extraordinary Career Leadership Certification" which removes teaching and administrative experience as hiring criteria.

PSSAM actually initiated the work group that was established by MSDE to review the superintendent's certification criteria. Dr. Theresa Alban was PSSAM's representative, as she was the first to express her concerns regarding several staff on her leadership team who had completed doctoral programs in Educational Leadership from the University of Maryland, but weren't considered certifiable as a superintendent. In no way was it the intent of our request to diminish the superintendent's criteria from having an education background! Quite the contrary, it was to approve our doctoral candidates for certification.

It is critical for local superintendents to be strong instructional leaders to provide one vision and one voice for every child in Maryland's Public Schools. We believe teaching and administrative experience in the field of education builds credibility within the workforce they lead. I for example was a principal at four different schools in my district at all three levels: elementary, middle, and high, as well as, Director of School Improvement and the Assistant Superintendent for Administrative Services. These authentic experiences have given me insight into all aspects of the organization, which allows me to reflect and question effectiveness and efficiencies of organizational practices on a daily basis. Superintendents serve our school boards and work collaboratively with our county commissioners to obtain funding for the school system. We are "Extraordinary Career Leaders" in education who must have a voice at the table in this capacity when making policy and funding decisions.

Leaders in other professions such as the military, medicine, law, and business have earned these servant leadership positions through hard work, commitment, and expertise within the field. We are asking the same for education.

The consideration to reduce the criteria for those becoming superintendent is counterintuitive when at the same time the Kirwan Commission is considering recommendations to increase the certification requirement of teachers and administrators.

The one-year term provision of the proposed regulations is also highly troublesome when trying to build on consistency and stability. A oneyear term—which would really be July 1 through January 31 based on notification and hiring timelines—provides a short timeframe for any candidate to successfully get initiatives in place and hire top-level staff. When I became superintendent, we began a five-year strategic planning process with built in accountability. Just as elected officials, a four-year term allows for the public to demand a return on their investment by working the plan to churn results. This cannot be done in a one year term as a superintendent.

We've seen the detrimental effects of too much change in educational leadership. Student learning is negatively impacted when there are constant starts and stops with curriculum, services, and overall decisionmaking about how to move a school system and student success forward.

To maintain strong criteria for the position of superintendent to be the instructional leader of the caliber our students deserve, we strongly oppose removing teaching and administrative experience as part of the criteria and the addition of granting a one-year term for superintendents.

PSSAM represents over 880,000 students and we are jointly committed to partnering with local boards and governments to sustain excellence in education for all of these students. Warren Bennis, chairman of the Leadership Institute at the University ofSouthern California stated, "Leadership is the capacity to transformvision into reality." This takes time and trust!To be inspired is great, but to inspire is an honor. I hope you have beeninspired to rethink this COMAR change. Thank you!

Respectfully submitted,

Kelly L. Griffith, Ed.D.

September 25, 2018