



Mohammed Choudhury
State Superintendent of Schools

TO: Members of the State Board of Education

FROM: Mohammed Choudhury, State Superintendent of Schools

DATE: July 25, 2023

SUBJECT: COMAR 13A.03.02
Graduation Requirements for Public High Schools in Maryland
COMAR 13A.03.04
Test Administration and Data Reporting Policies and Procedures
Permission to Adopt

Purpose

The purpose of this item is to seek approval from the State Board of Education to formally adopt the amendments to the Code of Maryland Regulations (COMAR) 13A.03.02 *Graduation Requirements for Public High Schools in Maryland* and COMAR 13A.03.04 *Test Administration and Data Reporting Policies and Procedures*. The Maryland State Department of Education (MSDE) has reviewed the feedback received from the field during the 30-day public comment period to address amendments to COMAR 13A.03.02 and 13A.03.04. These amendments are needed due to the Blueprint for Maryland’s Future legislation and the use of statewide assessments for high school mathematics and English Language Arts (ELA) to meet the College and Career Readiness (CCR) standard as identified in the Blueprint.

Regulation Promulgation Process

Under Maryland law, a state agency, such as the State Board of Education (State Board), may propose a new or amended regulation whenever the circumstances arise to do so. After the State Board votes to propose such a regulation, the proposed regulation is sent to the Administrative, Executive, and Legislative Review (AELR) Committee for a 15-day review period. If the AELR Committee does not hold up the proposed regulation for further review, it is published in the Maryland Register for a 30-day public comment period. At the end of the comment period, Maryland State Department of Education (MSDE) staff reviews and summarizes the public comments. Thereafter, MSDE staff will present a recommendation to the State Board of Education to either: (1) adopt the regulation in the form it was proposed; or (2) revise the regulation and adopt it as final because the suggested revision is not a substantive change; or (3) revise the regulation and re-propose it because the suggested revision is a substantive change. At any time during this process, the AELR Committee may stop the promulgation process and hold a hearing. Thereafter, it may be recommended to the Governor that the regulation not be adopted as a final regulation or the AELR Committee may release the regulation for final adoption.

Background and Historical Perspective

The Maryland High School Graduation Task Force was first convened in January 2018 at the request of the State Board of Education and the State Superintendent of Schools to conduct a systemic, comprehensive review of the entire set of academic credits, graduation requirements, and the associated Code of Maryland Regulations (COMAR). The Task Force which included widespread representation and engagement from stakeholders was charged with considering current research, data, and policies on diplomas, credits, and assessments to make recommendations to the State Board.

The Task Force findings showed that high stakes exit exams disproportionately and negatively impact minority and economically disadvantaged students, reducing their likelihood of graduating from high school. The Task Force findings also indicated that a student's course grade is a stronger predictor of college and career success than performance on standardized assessments. The Task Force recommended revised graduation requirements to the State Board and the State Superintendent beginning in the 2022-2023 school year to include that students must take assessments in algebra, English, science, and government, and the assessments would account for 20% of the student's final grade in the respective high school level course as an end-of-course (EOC) exam. The transition away from high stakes exit exams to EOC exams reduces barriers created by high stakes testing while still holding schools accountable for ensuring student academic achievement.

After considering national trends and policies from other states as well as the findings from the High School Graduation Task Force, the State Board voted on May 25, 2021, to decouple the high stakes high school exit exams from graduation requirements. The assessments would account for 20% of the student's final grade in the respective high school level course as an EOC exam.

The State Board approved MSDE's request for permission to publish amendments to COMAR 13A.03.02 *Graduation Requirements for Public High Schools in Maryland* at the January 2021 State Board meeting. The amendments were published in the Maryland Register from April 9, 2021, to May 10, 2021. The State Board adopted the amendments on May 25, 2021, and the final regulation was published following approval by the State Board on June 14, 2021. See 48: 12 Md. R. 474.

Due to the COVID-19 pandemic, the transition to the new Maryland Comprehensive Assessment Program (MCAP), and the transition from high stakes exit exams to an EOC exam was disrupted, which resulted in waivers from the COMAR requirements due to the unprecedented effect of the pandemic (school years 2019-2020, 2020-2021, 2021-2022, and 2022-2023).

COMAR 13A.03.02 was scheduled to go into effect in the school year 2022-2023. However, LEAs indicated that additional time was needed to successfully implement the necessary systemic changes, and to transition to an EOC exam accounting for 20% of the student's final grade in the respective high school level courses. Considering the request of local superintendents for additional time to implement this systemic change, and due to the challenges of emerging from the COVID-19 pandemic, the State Superintendent of Schools recommended, and the State Board granted a waiver of COMAR 13A.03.02.06H(2), collectively for all LEAs for good cause. Taking the MCAP continued to be required for graduation but would not count for 20% of the student's final grade in the respective high school level courses. All other graduation requirements of COMAR 13A.03.02 continued to remain in effect and in force.

On January 24, 2023, the State Board granted permission to publish amendments to remove the EOC exam requirement for the mathematics and English assessments in high school in COMAR 13A.03.02 *Graduation Requirements for Public High Schools in Maryland*. Starting in school year 2023-2024, science and government assessments will remain EOC exams accounting for 20% of the student's final grade in the respective high school

level courses. Additional amendments align the regulation with the change in the EOC exams. The change to the *Graduation Requirements for Public High Schools in Maryland* is needed due to the Blueprint for Maryland's Future legislation and the use of statewide assessments for high school mathematics and English to meet the College and Career Readiness (CCR) standard as identified in the Blueprint.

College and Career Readiness Standards

The amendment to the regulation supports the implementation of the Blueprint for Maryland's Future and the transition to a CCR determination that requires that students are assessed in mathematics and English by the end of grade 10. The Blueprint for Maryland's Future calls for a clear definition of a college and career readiness standard and a system of assessments that ensure students are reaching their goals and receiving the support needed.

To inform the new CCR standards and as required by the Blueprint, MSDE has commissioned a research study to define and verify the CCR standard. While the final report will be completed by September 1, 2023, the interim report indicates that a CCR standard which includes multiple measures, specifically mathematics and English assessments and a measure of grade point average, more accurately identifies students as college and career ready than performance solely on a high stakes assessment.

MSDE is working to develop and propose a long term CCR standard that relies on more than a standardized test result to assess students by the end of grade 10 in mathematics and English. The State Board adopted an interim CCR standard February 22, 2022. Based on the results of the commissioned CCR study, the current interim CCR standard will be reevaluated and revised as needed.

Engagement

Throughout the process of reviewing the Maryland graduation assessment requirements, and the transition from high stakes exit assessments to EOC exam implementation, MSDE has engaged stakeholders, facilitated opportunities for collaboration, and provided technical assistance.

The Maryland High School Graduation Task Force engaged stakeholders at multiple levels culminating in recommendations to the Department and the State Board. The Task Force met 14 times between January and September 2018. Each meeting was three hours, and all meetings were open to the public. Stakeholders included representatives from the following organizations¹:

- Maryland State Education Association
- Maryland Business Roundtable
- Maryland School Counselor Association
- Maryland Chamber of Commerce
- Maryland Parent Teacher Association
- University System of Maryland
- Maryland Department of Labor, Licensing, and Regulation
- Maryland Higher Education Commission
- Maryland State Board of Education
- Maryland Independent College and University Association

¹ <https://www.marylandpublicschools.org/about/Pages/MHSGTF/members.aspx>

- Special Education State Advisory
- Maryland Association of Boards of Education
- Maryland Association of Elementary School Principals
- Maryland Association of Student Councils
- Public School Superintendents Association of Maryland
- Maryland State Department of Education
- Office of the Attorney General
- Maryland English Language Learning Family Involvement
- Maryland Department of Human Services
- Maryland Association of Secondary School Principals
- Maryland Teacher of the Year
- Maryland Governor's Office
- Maryland Association of Community Colleges
- Education Strategy Group

MSDE directly and frequently engaged local education agencies (LEAs) to support the statewide transition to EOC exams.

- MSDE set up workgroups to address areas most in need as identified by LEAs including a Grading Policy Workgroup, Accountability Workgroup, EOC Administration Workgroup, and an External Stakeholders work group. These workgroups included LEA educators, school administrators, local accountability coordinators, special education specialists, English as a second language resource staff, assistant superintendents, educators, LEA curriculum supervisors, counselors as well as staff at the Maryland State Department of Education's curriculum, special education, English as a Second Language, assessment, and accountability offices. These workgroups occurred from October 2021 to August 2022.
- MSDE informed LEA Superintendents weekly beginning in May through October 2022 of the EOC exam requirement including information on EOC waivers and the updates to COMAR graduation assessment requirements. Information was shared indicating that EOCs would count as 20% of a student's grade beginning with the 9th grade first time test takers in school year 2023-2024.
- MSDE has met consistently every month with LEA Assistant Superintendents beginning in April of 2022 to the present, frequently providing additional technical assistance through the 2021-2022 and 2022-2023 school years. These meetings provided opportunities for peer-to-peer collaboration, status updates and feedback to inform technical assistance.
- MSDE has met consistently bi-monthly with local accountability coordinators (LAC) to field questions and provide status updates and technical assistance related to MCAP. In particular, MSDE hosted an in-person LAC meeting at the Maryland Assessment Group Conference regarding the transition to EOCs, provide information and receive input to inform technical assistance.

MSDE conducted a pilot to support the system implementation of EOC exams. In March 2022, MSDE surveyed LEAs to provide information regarding their local grading programs in order to prepare technical support statewide to import EOC exam data. In November 2022, MSDE sent an invitation to Superintendents inviting LEAs to participate in an EOC exam pilot for importing test results into grading programs. Nine districts joined the pilot, which enabled the development of a solution for each of the four locally used grading programs. The LEAs that participated in the pilot were:

- Anne Arundel County
- Baltimore City
- Calvert County
- Caroline County
- Cecil County
- Montgomery County
- Wicomico County
- Worcester County

From December 2022 to June 2023, MSDE staff worked with LEA technical staff, and assessment vendors to provide technical assistance and knowledge sharing across LEAs. Once completed, MSDE shared the EOC grade import options and reporting solutions as part of the ongoing LAC and Assistant Superintendent meetings. MSDE continues to offer ongoing on-demand technical assistance for local grading program planning.

In addition, MSDE engaged other states during the 2022-2023 school year to better inform the statewide implementation. Outreach included to states that have current EOC exams including for example, Georgia and North Carolina. MSDE also engaged Maryland’s Technical Advisory Committee on the technical aspects of the EOC exam implementation and grade conversion. A dedicated MSDE assessment webpage for EOCs was created for access to publicly available information including a “Frequently Asked Questions” (FAQ) document.

Executive Summary

Proposed amendments to the regulations included:

1. Starting in school year 2023-2024, the American Government Assessment and the Life Science Maryland Integrated Science Assessment (LS MISA) will count for 20% of the student’s final grade in the respective high school level courses.
2. Remove the EOC requirement for the mathematics and English Language Arts assessments in high school.

The State Board reviewed COMAR 13A.03.02 *Graduation Requirements for Public High Schools in Maryland* at the January 24, 2023, State Board meeting and granted permission to publish.

The proposed regulations were published in Volume 50-11 of The Maryland Register on June 2, 2023. During the 30-day comment period, MSDE received five (5) public comments.

The organizations that provided comments were:

- Anne Arundel County Public Schools
- Baltimore City Public Schools
- Baltimore County Public Schools
- Montgomery County Public Schools
- Public School Superintendents’ Association of Maryland (PSSAM)

A summary of the comments along with a copy of the submissions are attached. Three (3) or more commenters had six (6) concerns about the regulations. First, all five (5) commenters were concerned that the proposed implementation timeline leaves insufficient time for local education agencies (LEAs) to plan and implement changes to systems, including grading and reporting procedures, with fidelity prior to the beginning of the 2023-2024 school year. A waiver was granted for the 2022-2023 school year, during which districts were provided time to prepare for

EOC implementation. In addition, targeted technical assistance was and continues to be provided to support the statewide implementation of the EOC exams.

Second, four (4) commenters from Anne Arundel County Public Schools, Baltimore City Public Schools, Baltimore County Public Schools, and Montgomery County Public Schools requested a delay in the inclusion of EOC Life Science Maryland Integrated Science Assessment (MISA) and Government exams as 20% of a student's final grade until the 2024-2025 school year to allow LEAs to adjust policies. A one-year delay was previously provided to LEAs at their request with multiple engagement opportunities provided to LEAs in anticipation of the upcoming change in regulation.

Third, four (4) commenters from Anne Arundel County Public Schools, Baltimore City Public Schools, Baltimore County Public Schools, and PSSAM expressed concerns that LEAs will experience delays planning, implementing, and developing communication strategies to inform families and staff around the changes. LEAs were invited to join a pilot a full year in advance of the planned EOC implementation to discuss and develop customizable implementation and communication strategies for their local context.

Four (4) commenters from Anne Arundel County Public Schools, Baltimore City Public Schools, Baltimore County Public Schools, and PSSAM were concerned that test scores will not be returned to schools in a timely fashion to incorporate test performance in the final grade. The new EOC reporting solution will deliver EOC results and grade conversions to LEAs within nine (9) days of students completing the assessment. This timeline provides LEAs with time to input data in local grading programs. The new EOC reporting solution will be operational for the 2023-2024 school year.

Four (4) commenters from Baltimore City Public Schools, Baltimore County Public Schools, Montgomery County Public Schools and PSSAM indicated that there are questions that should be addressed before the EOC exams take effect. All critical questions have been addressed over the past year, and MSDE continues to respond to questions during ongoing engagement opportunities. MSDE and LEAs have collaborated over the past year to identify and address arising questions in support of a successful EOC exam implementation in the 2023-2024 school year for incoming 9th grade students. MSDE stands ready to support LEAs during the transition.

Lastly, three (3) commenters from Anne Arundel Public Schools, Baltimore County Public Schools, and PSSAM expressed concerns that the requirement to participate but not pass English 10 and Algebra I removes incentives for students taking English 10 and Algebra I to do well on the test. English 10 and Algebra I currently are assessments that are used for the designation of CCR and as required per the Maryland Blueprint.

Based on a thorough review of the comments, the depth of engagement provided for Maryland's LEAs, and the infrastructure that is currently in place, MSDE recommends no changes to the language in the regulation.

MSDE will ensure that guidance and technical assistance to the LEAs on implementation of the new regulations will address concerns outlined in the comments.

Amendments to COMAR 13A.03.04 *Test Administration and Data Reporting Policies and Procedures* change the names of the assessments and the definition of local school system to local education agency.

Action

Request adoption of amendments to COMAR 13A.03.02 *Graduation Requirements for Public High Schools in Maryland* and COMAR 13A.03.04 *Test Administration and Data Reporting Policies and Procedures*.

Attachments

COMAR 13A.03.02 *Graduation Requirements for Public High Schools in Maryland* and COMAR 13A.03.04 *Test Administration and Data Reporting Policies and Procedures*

Comment Submissions

Title 13A

STATE BOARD OF EDUCATION

Subtitle 03 GENERAL INSTRUCTIONAL PROGRAMS

Notice of Proposed Action

[23-078-P]

The Maryland State Board of Education proposes to amend:

(1) Regulations **.02**, **.04**, **.06**, **.07**, **.09**, and **.09-1** under **COMAR 13A.03.02 Graduation Requirements for Public High Schools in Maryland**; and

(2) Regulations **.01** and **.02** under **COMAR 13A.03.04 Test Administration and Data-Reporting Policies and Procedures**.

This action was considered by the State Board of Education at its January 24, 2023, meeting.

Statement of Purpose

The purpose of this action is to align regulations with legislation around Statewide assessments for high school mathematics and English language arts to meet the College and Career Readiness standard found in the Blueprint for Maryland's Future.

Estimate of Economic Impact

The proposed action has no economic impact.

Economic Impact on Small Businesses

The proposed action has minimal or no economic impact on small businesses.

Impact on Individuals with Disabilities

The proposed action has no impact on individuals with disabilities.

Opportunity for Public Comment

Comments may be sent to Chandra Haislet, Assistant State Superintendent, Maryland State Department of Education, 200 West Baltimore Street, Baltimore, MD 21201, or call 410-767-0025, or email to chandra.haislet@maryland.gov. Comments will be accepted through July 3, 2023. A public hearing has not been scheduled.

Open Meeting

Final action on the proposal will be considered by the State Board of Education during a public meeting to be held on July 25, 2023 at 9 a.m., at 200 West Baltimore Street, Baltimore, MD 21201.

13A.03.02 Graduation Requirements for Public High Schools in Maryland

Authority: Education Article, §§2-205, 7-203, 7-205, 7-205.1, and 8-404, Annotated Code of Maryland

.02 Definitions.

A. (text unchanged)

B. Terms Defined.

[(1) "Combined score" means the sum of specific scores as established by the Department on the Maryland Comprehensive Assessments for algebra, science, English, and government.]

[(2)] (1)—[(3)] (2) (text unchanged)

(3) "EOC Assessment" means an end-of-course assessment that comprises 20 percent of the student's grade in that course.

[(4) "HSA" means the high school assessments in science and government aligned with the Maryland Standards.]

[(5)] (4) (text unchanged)

[(6)] (5) "Maryland Comprehensive Assessments" means the [HSA or other] assessments *within the Maryland Comprehensive Assessment Program* in algebra, science, English, and government developed or adopted by the Department[, including those assessments formerly known as the Maryland High School Assessments,] that are aligned with and measure a student's skills and knowledge as set forth in the Maryland Standards for those subjects.

[(7) "MCAP" means the Maryland Comprehensive Assessment Program, which includes assessments in algebra, science, English, and government developed or adopted by the Department, specified in §B(4) of this regulation.

(8) "Minimum score" means an acceptable score established by the Department below the passing score on a Maryland Comprehensive Assessment that may be used by a student to satisfy the combined score option.]

.04 Other Provisions for Earning Credit.

A.—E. (text unchanged)

F. College Courses. Consistent with the payment requirement of Education Article, §§18-14A-04 and 18-14A-05, Annotated Code of Maryland, [local school system policies and procedures prior approval of the local superintendent of schools or the

superintendent's designee, and aligned with the Maryland College and Career Ready Standards or an elective credit for graduation requirements,] credit toward high school graduation shall be given for courses offered by accredited colleges[.] *that:*

- (1) *Meet the local school system policies and procedures;*
- (2) *Have prior approval of the local superintendent of schools or the superintendent's designee;*
- (3) *Are aligned with the Maryland College and Career Ready Standards or an elective credit for graduation requirements;*

and

- (4) *Prepare students to earn an industry-recognized credential or college credits.*

G.—H. (text unchanged)

.06 Maryland Comprehensive Assessments.

A.—B. (text unchanged)

[C. Each local school system shall provide appropriate assistance to strengthen areas of weaknesses for students who have not achieved satisfactory scores on the Maryland Comprehensive Assessments.

D. Bridge Plan for Academic Validation.

(1) Eligibility Criteria. A student is eligible to satisfy the graduation assessment requirement through the Bridge Plan for Academic Validation if the student has:

- (a) Failed one or more Maryland Comprehensive Assessments;
- (b) Received credit in the course or courses related to the assessment or assessments;
- (c) Demonstrated overall satisfactory attendance in the most recent school year completed; and
- (d) Demonstrated satisfactory progress toward achieving the high school diploma requirements specified in COMAR 13A.03.02.09B(1) and (2); and
- (e) Participated successfully in appropriate assistance as defined in §C of this regulation after having failed one or more of the Maryland Comprehensive Assessments.

(2) A student may begin a Bridge Project after one failure of a Maryland Comprehensive Assessment.

(3) A student may use the score on the Bridge Project to meet the graduation requirement only after the student has taken the Maryland Comprehensive Assessment twice and failed twice.

(4) The Bridge Plan for Academic Validation shall consist of:

- (a) Specific modules developed by the Department in each of the Maryland Comprehensive Assessments content areas;
- (b) The assignment by the local school system of one or more modules for completion by each student meeting the eligibility criteria;
- (c) Scoring by the local review panels of the completed modules according to State-developed, Statewide scoring protocols;
- (d) A recommendation from the local review panels to the local superintendent as to the outcome of the scoring of each student's module or modules;
- (e) Acceptance or rejection by the local superintendent of the local review panel's recommendations; and
- (f) An opportunity for the student to appeal the local superintendent's decision to the State Superintendent of Schools.]

[E.] C. Reporting Student Performance.

(1) A school system shall state on the student's performance record card only that the student has or has not met all assessment requirements [and shall not describe the option used to meet the requirement].

(2) For the purpose of this section, except for students identified in [§F] §D of this regulation, "met all assessment requirements" means [achieving a passing score on] *taking* all Maryland Comprehensive Assessments[, or meeting the requirements of the combined score option, or successfully completing a Bridge Project in those assessment areas that the student did not pass].

[F.] D. For the 2020—2021, [and] 2021—2022, and 2022—2023 school years, a student will have met the assessment requirement for Algebra I, English 10, science, and government if:

(1)—(2) (text unchanged)

[G. Students graduating in school year 2020—2021 are exempt from taking the MCAP American Government Assessment.]

[H.] E. Beginning with the [2022—2023] 2023—2024 school year[, at the latest]:

(1) (text unchanged)

(2) [The] *Students entering the ninth grade, the Maryland Comprehensive Assessment for [algebra, English,] science[, and government shall account for 20 percent of the student's final grade in the respective high school level [algebra, English,] science[, and government courses.*

[I. Reporting Student Performance.

(1) A school system shall state on the student's performance record card only that the student has or has not taken the respective assessment in algebra, English, science, and government.

(2) Except for students identified in §F of this regulation, "met all assessment requirements" means having taken the assessments in algebra, English, science, and government as a part of the respective course.]

.07 Notice to Parents or Guardians and Students.

Each principal shall inform all students and their parents or guardians annually at a minimum of the following:

A.—B. (text unchanged)

C. The results of each Maryland Comprehensive Assessment taken [or Bridge Project completed by the student];

[D. A plan for appropriate assistance, if applicable;]

[E.] D. (text unchanged)

[F.] E. Beginning with the [2022—2023] 2023—2024 school year, [at the latest,] the student’s progress on completing the course credit, which includes the end-of-course Maryland Comprehensive Assessment in [algebra, English,] science[, and government, service, and applicable IEP requirements for graduation.

.09 Diplomas and Certificates.

A. (text unchanged)

B. Maryland High School Diploma. Except as provided in Regulation .12 of this chapter[, and in §C of this regulation], to be awarded a Maryland high school diploma, a student shall:

(1)—(2) (text unchanged)

(3) Meet the graduation assessment requirements in the following ways:

(a) [Achieve a passing score on] *Take* the Maryland Comprehensive Assessments for Algebra I, science, government, and English 10; *or*

[(b) Achieve a combined score(s) as established by the Department on the Maryland Comprehensive Assessments;]

[(c) (b) [Achieve a passing score on] *Take* an approved alternative assessment as established by the Department, such as Maryland Comprehensive Assessment for Algebra II, Advanced Placement examinations, SAT, ACT, or International Baccalaureate examinations; or].

[(d) Except for students described in Regulation .06F of this chapter, if a student is unable to meet the requirements in §B(3)(a)—(c) of this regulation, then the student shall satisfactorily complete the requirements of the Bridge Plan for Academic Validation as set forth in Regulation .06D of this chapter.]

C. Exception to Passing Score Requirement.

[(1)] For the 2020—2021, [and] 2021—2022, *and* 2022—2023 school years, students taking the Algebra I, English 10, science, and government Maryland Comprehensive Assessment will meet the graduation assessment requirement for Algebra I, English 10, science, and government.

[(2) Students who pass the Algebra I, English 10, science, and government courses are exempt from completing a Bridge Project, as set forth in Regulation .06 of this chapter.

(3) For all students taking the Maryland Integrated Science Assessment in the 2017—2018, 2018—2019, 2019—2020, and 2020—2021 school years, taking the Maryland Integrated Science Assessment will meet the graduation assessment requirement for science.]

D.—G. (text unchanged)

H. Maryland High School Diploma. Beginning with the 2022—2023 school year, [at the latest,] except as provided in Regulation .12 of this chapter, [and in §C of this regulation,] to be awarded a Maryland high school diploma, a student shall:

(1)—(2) (text unchanged)

I. (text unchanged)

.09-1 Appeal of Denial of Diploma for Failure to Meet Maryland Comprehensive Assessment Requirement.

A.—B. (text unchanged)

C. On or before April 1, the school system shall identify each student who may fail to graduate because[;] *the student has taken none of the required Maryland Comprehensive Assessments.*

[(1) The student has taken none of the required Maryland Comprehensive Assessments; or

(2) The student has taken some or all of the Maryland Comprehensive Assessments and failed some or all of them.]

D. (text unchanged)

E. By April 1, for each senior identified in §C of this regulation, the school principal shall consider whether to recommend to the local superintendent a waiver of the Maryland Comprehensive Assessment graduation requirements that the student has not fulfilled to date if:

[(1) The student meets the following criteria:

(a) The student has or will meet all other graduation requirements;

(b) The student has or will take all required Maryland Comprehensive Assessments before the graduation date; and

(c) If the student had an opportunity to participate in one or more interventions, or remediation opportunities, including the Bridge Plan, the student participated in them; and]

(1) *The student has or is expected to meet all the other graduation requirements; and*

(2) The student is prevented from meeting the Maryland Comprehensive Assessment graduation requirements because:

(a)—(c) (text unchanged)

(d) The student moved to Maryland in the senior year[, has passed all the Maryland Comprehensive Assessment courses, but has failed the related Maryland Comprehensive Assessment, and has had no adequate opportunity for intervention].

F.—N. (text unchanged)

13A.03.04 Test Administration and Data-Reporting Policies and Procedures

Authority: Education Article, §§2-205 and 7-203, Annotated Code of Maryland

.01 Scope.

This chapter applies to:

A. Tests administered by or through the State Board of Education, including but not limited to:

(1)—(3) (text unchanged)

(4) [The Multi-State Alternate Assessment (MSAA)] *The Alternative Maryland Comprehensive Assessment for Government (Alt-Gov)*;

(5) The [High School] *Maryland Comprehensive Assessment for Government [(HSA Government)]*;

(6) The [High School Assessment for Science (HS MISA)] *Life Science Maryland Integrated Science Assessment (LS MISA)*;

(7)—(11) (text unchanged)

B.—D. (text unchanged)

.02 Definitions.

A. (text unchanged)

B. Terms Defined.

(1)—(2) (text unchanged)

(3) [Local School System] *Local Education Agency*.

(a) ["Local school system"] "*Local education agency*" means a public school system.

(b) ["Local school system"] "*Local education agency*" includes special schools and institutions and nonpublic schools approved under COMAR 13A.09.10 that use tests administered on behalf of the State Board of Education.

(4)—(5) (text unchanged)

MOHAMMED CHOUDHURY
State Superintendent of Schools

June 30, 2023

Ms. Chandra Haislet, Assistant State Superintendent
Maryland State Department of Education
200 West Baltimore Street
Baltimore, Maryland 21201

Ms. Haislet:

This letter is a formal response from Baltimore City Public Schools (City Schools) to the proposed regulations amendments (Regulations .02, .04, .06, .07, .09, and .09-1) under COMAR 13A.03.02 Graduation Requirements for Public High Schools in Maryland; and Regulations .01 and .02 under COMAR 13A.03.04 Test Administration and Data-Reporting Policies and Procedures. The purpose of this proposed action is to align regulations with legislation around Statewide assessments for high school mathematics and English language arts to meet the College and Career Readiness standard found in the Blueprint for Maryland's Future.

City Schools is requesting a delay in the implementation of these amended regulations, specifically the inclusion of End of Course Life Science Maryland Integrated Science Assessment (MISA) and Government exams as 20% of a student's final grade, until the 2024-25 school year. The late revisions to these regulations; the lack of a final decision prior to the end of the 2022-23 school year; the communication challenges these regulations present; and the misalignment with City Schools' grading philosophy are all significant barriers to meaningful implementation. An additional year would provide the space for intentional planning and communication based on the most accurate, finalized information, an opportunity that we have not had during the 2022-23 school year.

Ongoing Policy Shifts

The decision to shift the graduation requirement to End of Course Exams that would count for 20% of a student's final course grade was approved by the State Board of Education in May 2021. However, the myriad tweaks and adjustments that have followed have made clear communication and local policy revisions incredibly challenging:

- On June 22, 2022, in an Assistant Superintendents meeting, MSDE promised that leading up to implementation, "the MSDE will provide frequent and ongoing technical assistance webinars, guidance materials, toolkits, and an implementation playbook."
- On June 28, 2022, the State Board of Education approved a waiver of the End of Course Exams for the 2022-23 school year, shifting implementation to the 2023-24 school year.
- In July 2022, MSDE released a document with Frequently Asked Questions about End of Course Exams. Though this was highlighted in a September 2022 Assistant Superintendent's meeting with the indication that a version 2 was "coming soon," no updated document has been provided in the intervening year. While there have been several updates on the technical side, the promised "targeted communications strategy" and guidance on the curricular and instructional shifts required because of these changes has been lacking.

- Also in September 2022, MSDE shared a “policy changes checklist” for districts to use to prepare for implementation. In response to these changes, Baltimore drafted updated grading regulations to align with COMAR, only to have the State Board of Education put forward COMAR changes in January 2023 to no longer require English 10 and Algebra I MCAP exams to count for 20% of student grades, but rather just to be completed. This pause is intended to ensure alignment with the College and Career Readiness standards, pending the results of the College and Career Readiness study that will be completed in September 2023.
- It is important to note that the MCAP exam window closes weeks earlier than the typical City Schools’ final exam window, meaning that students will have less instructional time in these tested areas, at the same time that the stakes for students are raised higher. The decreased instructional time requires the district to adjust curricular pacing guides to ensure that all standards are covered by the MCAP assessment window. While we began reviewing such adjustments this year, the late confirmation of this regulation has made final curricular decisions – and associated professional development – challenging.

City Schools has now drafted multiple revisions of our grading regulations to align with changing COMAR. With these currently proposed COMAR amendments still not finalized, we have entered the summer without final, solidified policy regulations to share with schools. These multiple shifts and lack of promised communication resources have created confusion for our schools and hindered their ability to communicate clearly with their families.

Challenges in Communication to Students and Families

A delay in the implementation of End of Course Exams until the 2024-25 school year would also support clear communications about the implications of these exams for students and families. In December 2022, Assistant Superintendents received a draft version of a concordance table that provided the conversion of MISA and Government End of Course exam scale scores to exam grades that will count for 20% of a student's final course grade. In Maryland, we have spent the past decades of assessments communicating to students and families that Performance Levels 3 and 4 are evidence of “Proficient” and “Advanced” (now “Distinguished”) achievement. According to the draft MISA EOC Lookup Table, shared in December 2022 at the Assistant State Superintendent meetings, a “Proficient” score could yield a grade of A (90%), B (80-89%), or C (75-79%).

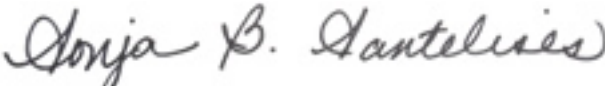
Whatever sense these cut scores make from a statistical perspective, a low B or a C grade does not easily translate into the common-sense understanding that students and families have about what it means to be “proficient.” Ultimately, schools and districts will be left holding the responsibility for explaining these test scores – and the consequent impact on students’ grade point averages and post-secondary aspirations. More time is needed to review these changes, and MSDE has a role to play in providing clear guidance about what the conversion of test scores to grades indicates about student understanding of the content.

Philosophical Misalignment

City Schools believes that an assessment should be student-centered and requires a commitment by all stakeholders to provide opportunities for students to demonstrate learning, growth, and mastery. Ongoing meaningful assessments provide important information about student learning that can guide both educators and students. We firmly believe in providing ample opportunities to students for demonstrating their acquired knowledge through the process of reassessment. Over the past several years, we have revised our grading policy and regulations to highlight the importance of reassessment to ensure that the grades awarded are a true reflection of a student's understanding of the concepts and skills that have been taught. A one-time final

exam worth 20% of a student's course grade is at odds with our policy direction – and appears to be equally misaligned with MSDE's emphasis on reassessment as well. The incorporation of End of Course exam scores into final grades also has the potential unintended consequence of placing Maryland students at a postsecondary disadvantage compared with their similarly performing peers in other states. City Schools respectfully requests, in addition to a delay in implementing End of Course exams until the 2024-25 school year, that MSDE consider whether this approach is truly the best way to assess students' true knowledge and skills gained in the course of their learning.

Respectfully submitted,

A handwritten signature in cursive script that reads "Sonja B. Santelises". The signature is written in black ink and is positioned below the typed name.

Sonja Brookins Santelises, Ed.D.
Chief Executive Officer



Mary Pat Fannon, Executive Director
1217 S. Potomac Street
Baltimore, MD 21224
410-935-7281
marypat.fannon@pssam.org

July 3, 2023

Ms. Chandra Haislet, Assistant State Superintendent
Maryland State Department of Education
200 West Baltimore Street
Baltimore, Maryland 21201

Sent via electronic mail only

RE: Regulations under COMAR 13A.03.02 – Graduation Requirements for Public High Schools in Maryland

Dear Ms. Haislet:

The Public School Superintendents' Association of Maryland (PSSAM), on behalf of all twenty-four local school superintendents, has reviewed the proposed changes to COMAR 13A.03.02, entitled "Graduation Requirements for Public High Schools In Maryland," that were published in Volume 50-11 of The Maryland Register on June 2, 2023, and offers the following comments for your consideration.

PSSAM shares concerns expressed by other local education agencies (LEAs) regarding the proposed implementation timeline of the regulations. We are concerned that the expedited timeline leaves insufficient opportunity for local systems to implement these changes with fidelity prior to the beginning of the 2023-2024 school year. The current grading and assessment procedures in each system vary tremendously, and some counties may be required to develop entirely new grading and reporting procedures in order to meet the requirements. In addition to implementing the changes thoughtfully, a delay would allow sufficient time for LEAs time to plan for, implement, and develop a communication strategy to alert students, families, and staff about these proposed changes.

Additionally, we are concerned about the misalignment of the Advanced Placement (AP) United States Government & Politics curriculum with the skills tested by the Maryland Comprehensive Assessment Program (MCAP) American Government. Students who take AP courses might suffer undue detriment if their performance on the MCAP is calculated as part of their final course grade. Additionally, we believe that it is inappropriate for a student's AP assessment score to be counted towards their final course grade, and we fear that future enrollment in AP courses may suffer as a result.. Therefore, we request that the regulations include an exception for students enrolled in AP United States Government.

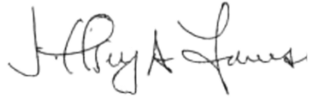
Furthermore, we emphasize the concerns expressed by LEAs regarding the Maryland State Department of Education's draft testing calendar. In the current version, the MCAP Government assessment window remains open until May 31st. Many school systems are worried that there is insufficient time between the end of the testing window and the date by which teachers close out their gradebooks. In turn, this could force school administrators to finalize individual grades, which might result in final grades that differ from what the teacher of record would have provided. Additionally, this change is most likely to affect seniors, whose grades are finalized prior to other students and are relying on these tests to pass graduation requirements and participate in graduation ceremonies. Lastly, the American Government MCAP assessment should be updated to ensure that students are assessed only on material that is taught before the testing window opens.

There is also a concern that these changes could remove, or diminish, incentives for students to do well on the English 10 and Algebra I MCA scores, which factor heavily in the Maryland School Report Card. By altering the regulations to require that students "take" rather than "achieve a passing score" on these exams, MSDE is removing an incentive for student performance. This change has the potential to negatively impact student assessment performance and school report cards.

Finally, there are outstanding questions that need to be addressed and resolved in order to ensure adequate implementation. For one, the regulations are unclear if students who fail the course, exam, or both, are required to retake the course, exam, or both. Additionally, MSDE's "Frequently Asked Questions" document regarding End of Course Exams, which was first released in July 2022 and highlighted during a September 2022 Assistant Superintendent's meeting was supposed to be updated to address ongoing questions, but this has not occurred. While there have been several updates on the technical side, the promised "targeted communications strategy" and guidance on the curricular and instructional shifts required is lacking. These concerns, as well as other outstanding questions brought forth by school systems, should be addressed by MSDE before the regulatory changes take effect in order to ensure meaningful implementation by local education agencies.

Thank you for your consideration and if there are any questions, please feel free to contact Mary Pat Fannon, Executive Director for PSSAM at marypat.fannon@pssam.org or 410-935-7281.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey A. Lawson". The signature is written in a cursive style with a large initial "J" and "L".

Dr. Jeffrey A. Lawson, Ed.D
Superintendent, Cecil County Public Schools
President, PSSAM

Cc: Maryland Superintendents
Milt Nagel, Executive Director, MABE
John Woolums, Director of Government Relations, MABE

BALTIMORE COUNTY PUBLIC SCHOOLS

Darryl L. Williams, Ed.D. ♦ Superintendent ♦ 6901 North Charles Street ♦ Towson, MD ♦ 21204

Department of Research, Accountability, and Assessment
Mr. Kevin Connelly
Executive Director

Office: 443-809-0319

Fax: 410-391-7260

TO: Dr. Chandra Haislet
Assistant State Superintendent

FROM: Ms. Stacy Shack
Local Accountability Coordinator

DATE: June 30, 2023

SUBJECT: Public Comment on COMAR changes to 13.A.03.02 Graduation Requirements for Public High schools in Maryland

The Maryland State Department of Education (MSDE) has requested changes to COMAR regulations for graduation requirements. Based on recommendations from the High School Graduation Task Force, MSDE is seeking to move the graduation assessments science and government to end-of-course assessments. In addition, while Algebra 1 and English 10 will be part of a student's qualification for a College and Career Ready designation, students will be required to take Algebra 1 and English 10 assessments, not pass them to graduate. Public comment on these changes is due to Dr. Haislet at MSDE by July 3, 2023. MSDE plans to share comments and seek approval from the State Board of Education at the July 25, 2023, Board meeting. We have compiled concerns about the changes being proposed below.

13.A.03.02.06 Maryland Comprehensive Assessments

- “Beginning with the 2023-2024 school year....”: (New E)

Consider changing 2023-2024 to the 2024-2025 school year to allow local school systems to have time to align and change local policies. In addition, this timeline would coincide with decisions around CCR and the criteria that will be used to determine CCR.

13.A.03.02.09 Diplomas and Certificates

- “Take an approved alternate assessment.....”. (.B.3b)

High school science and government now requires the test to be 20% of a student's final grade. If a student takes an approved alternate assessment in science or government, how will that affect the student's final grade in the course?

If a local system administers SAT during the school day, this language implies students will meet the requirement by taking the SAT if it is an approved alternate assessment. Will this be for both Algebra 1 and ELA 10?

13.A.03.02.09-1 Appeal of Denial of Diploma for Failure to Meet MCAP Requirement

- LSS “shall identify each student who may fail to graduate because the student has taken none of the required Maryland Comprehensive Assessments”. (C)

Why would the LSS not identify students who may fail to graduate because the student has only taken 1 to 3 of the assessments instead of the requisite 4?

- This section maintains language that allows an LSS to issue a waiver to the MCAP requirement due to a decision made by the LSS concerning the provision of appropriate assistance as required by 06C in the regulation. However, the language in 06C regarding this is being removed from the regulations (E.2)

Should this criterion for receiving a waiver due to the lack of appropriate assistance be removed since the language regarding that has already been removed from the regulation?

The language now implies that the LSS can essentially waive the requirement for taking the test. Was this what was intended?

If a student is granted a waiver, how is the final grade calculated in science and government?

Additional concerns

- The proposed language removes Algebra 1 and English 10 from being an end-of-course assessment that counts towards a student’s final grade. Students will know they only have to take the assessment and there is no motivation to take the test seriously. In addition, it may have the unintended consequence of placing more value on the MCAP LS-MISA and Government tests than the Algebra 1 and English 10.
- LSS will need to make policy changes based on changes to the testing requirements and the requirement to incorporate science and government test results into a student’s final course grade. These policy changes should begin only once final decisions have been made by the MSDE regarding logistics, state policies, and updated procedures for implementing this large change. Policy changes need to be put in place prior to implementation.
- With the new school year starting on July 1, we hope that the State Board will consider delaying implementation until the 2024-2025-school year to allow for both the MSDE and the LSS to adequately prepare for these changes. This will allow time for the state and subsequently the LSS to also address communication of these changes appropriately and completely to schools, parents/guardians, and students.
- How will the state direct LSS to handle failures and retakes.
 - If a student “passes” the test but still fails the course, the student will need to retake the course to earn the credit. Will they also need to take the test again at the end of the

second course enrollment?

- If a student does poorly on the test which causes them to fail the course, will the student need to repeat the entire course and testing cycle again or will they be permitted to retest to achieve a higher score that would allow them to pass the course.
- If the test score causes a student's final grade to be lower than expected, although they pass the course, will the student be allowed to retake the test to achieve a higher score and thus a higher final grade?
- Assessment results will need to be sent to each LSS in a timely fashion to allow for data not only to be incorporated into all student information systems, but also allow for the completion of grading and reporting on student's final report cards. This may affect the testing window which directly impacts the pacing for each of the assessed content areas.

Thank you for the opportunity to provide comments as you make the important decisions for all our students.

Dear Assistant State Superintendent Haislet:

Montgomery County Public Schools (MCPS) requests that the Maryland State Board of Education considers a delay to the implementation of the Maryland Comprehensive Assessment Program (MCAP) End Of Course (EOC) assessments in Biology and American Government assessments for an additional school year. Local Education Agencies (LEAs) will not have sufficient information and adequate time to successfully implement the recommended changes to ensure academic success of all students if adopted at the July 25 state board meeting. MCPS contends that the timeframe for the release of student scores, guidance for students who are not successful on the Advanced Placement (AP) Government exam, alternatives for Emergent Multilingual Learners (EML), and considerations for Students With Disabilities (SWD) are the most significant drivers that necessitate the delay in adopting this proposed action.

Timeframe for the Release of Student Scores

LEAs have not received an approximate time frame for the bi-annual release of EOC student scores. This impacts MCPS' ability to effectively process student grades through our student information system for report cards. This can lead to ramifications on students' official transcripts which can impact course schedules for the following school year and can negatively impact their GPA, resulting in potential ineligibility for extracurricular activities and athletics, application to college or other professional programs, or application for scholarships. This has a universal impact on all students with potentially additional negative consequences for our EMLs, students receiving special education services, and historically underserved racial/ethnic groups whose data indicate a disproportionate challenge meeting graduation requirements.

Guidance for students who are unsuccessful on the AP Government Exam

MSDE is lacking a clear course of action for students who may pass the AP Government course and score a two or below on the AP exam. Traditionally, schools receive the scores for students who take the AP Government exam in late summer. Students who score a two or below on the AP Government exam will have to take the MCAP for American Government to meet the EOC graduation requirement. MSDE has not clearly communicated an expectation of students' final grade being modified based on their EOC score, as well as a date or time frame for students who are unsuccessful on the AP Government exam to take the MCAP Government EOC. AP scores may not become available to LEAs prior to the summer MCAP assessment window and currently, there is no plan for an October testing window. Hence, AP Government students may have to wait until the winter MCAP testing window to take the EOC exam. As previously noted, the need for clear and coherent guidance in this area is specifically important to EMLs and SWD regardless of race/ethnicity. This now becomes an assessment of how well a student is able to remember content learned in prior high school classes in order to successfully pass a different assessment with a potentially different format/process.

Few to No Assessment Alternatives for EMLs and SWD

The Government and Biology EOCs are inherently a reading assessment before they are content assessments for EMLs. Without the English language proficiency to access all of the tasks and questions, EMLs are faced with a barrier before they are able to demonstrate what they know. This is even more complex for EMLs who are also identified to receive special education services. This is an equity issue that not only severely disadvantages EMLs but also distorts the data for both

LEAs and MSDE. High failure rates are more an indication of language barriers that prevent students from being able to read and comprehend MCAP EOCs content, than to a lack of content knowledge or skills. It is essential that the EOCs take into account students' linguistic needs. One possible consideration might be to provide assessment options in the native languages for these students, including those who are non-Spanish-speaking.

In addition, students who receive special education services will also be impacted from an equity perspective especially if they do not have an opportunity to retake the assessment within a timely manner or have an alternative to demonstrate mastery of course concepts. There will potentially be an increase in course failure rates for special education students as well.

Data from the College and Career Readiness (CCR) Empirical Study Interim Report suggests that LEAs should emphasize grade point averages (GPA) for CCR designation for EMLs due to their historic low performance on PARCC and MCAP assessments. Due to the lack of a modified assessment or multiple translation options, the MCAP EOC assessments will negatively impact EMLs and SWD GPAs; hence, it will be even more difficult for them to earn the CCR designation.

Conclusion

Without the additional guidance and time to implement the EOC assessments for Biology and NSL Government, we are unable to successfully move forward with the proposed change in a manner that considers the needs of all students. In the interest of students and their achievement, **MCPS respectfully requests that the implementation of the EOC assessments be delayed until the school year 2024-2025.** The additional time will enable districts to collaborate with MSDE to address the concerns identified above and develop a comprehensive plan for implementation.

Thank you for your consideration regarding this matter. A formal letter will be sent to your office shortly. Please feel free to contact me if you have questions.

Thank you,
Niki Hazel

Niki T. Hazel
Associate Superintendent
Office of Curriculum and Instructional Programs
Montgomery County Public Schools



July 3, 2023

Ms. Chandra Haislet
Assistant State Superintendent
Maryland State Department of Education
200 West Baltimore Street
Baltimore, MD 21201

Dear Ms. Haislet,

On behalf of Anne Arundel County Public Schools (AACPS), I am submitting this public comment on the proposed amendments to the Code of Maryland Regulations (COMAR) 13A.03.02 Graduation Requirements and COMAR 13A.03.04 Test Administration and Data-Reporting.

The purpose of the proposed changes are to align the regulations with legislation around Statewide assessments for high school mathematics and English language arts to meet the college and career readiness standards found in the Blueprint for Maryland's Future (Blueprint). The Blueprint requires that students take the English 10 and Algebra I Maryland College Assessment Program (MCAP) to be deemed college and career ready. Prior to this change in law, students were required to achieve a passing score on the MCAP for algebra, English, science, and government or complete the Bridge Plan for Academic Validation in order to graduate.

AACPS has several concerns regarding the regulatory changes proposed by the Maryland State Department of Education (MSDE). First, there is insufficient time to implement these regulatory changes in a thoughtful and thorough manner before the beginning of the 2023-2024 school year. The earliest these changes would become effective is August 21, 2023, one week before AACPS is scheduled to begin the 2023-2024 school year. Specifically, AACPS believes there is insufficient time to implement the new requirement that for students entering the ninth grade the MCAP for science and government shall count for 20 percent of the student's final grade in the respective high school course. State assessment scores have never been included in a student's final course grade and AACPS will need to develop an entirely new grading and reporting procedure to meet this new requirement. In addition, the vendor that is used by a large number of local education agencies, PowerSchool, has not sufficiently demonstrated that this technical procedure can be performed on a mass scale in June 2024.

Furthermore, as proposed this regulatory change will occur in the middle of the school year. Mid-year implementation of such a significant change to grading does not provide sufficient notice to students and parents/guardians. AACPS respectfully requests that MSDE delay the implementation of these regulations until the 2024-2025 school year to allow AACPS and other local education agencies sufficient time to plan for and implement these proposed changes, and to provide sufficient notification to students and families.

Second, AACPS is concerned regarding the requirement to include State assessment grades as part of a student's final course grade for science and government as it may delay final grade information and report cards for students, particularly seniors. The regulatory changes proposed provide no guarantee that AACPS and other local education agencies will receive State assessment data for the science and government MCAPs in a timeframe conducive to providing accurate and timely feedback to students and families regarding student grades, especially seniors who may be hoping to meet graduation requirements and participate in their graduation ceremonies. Also, the regulations are unclear if students who fail the course, exam, or both are

required to retake the course, exam, or both. These outstanding concerns should be addressed by MSDE before the regulatory changes take effect.

Additionally, AACPS questions the merits of including a State test as a part of a student's final course grade for science and government. AACPS' initial analysis of this proposal indicates that the vast majority of students with a 75% would be able to fail the MCAP and still receive a passing final grade in the course. AACPS believes this proposed practice is counterintuitive to the purpose and goal of the State MCAP assessments to measure both overall performance and progress on State standards if the majority of students can fail or perform poorly on the assessment and still meet the graduation requirements and, in many cases, keep the same grade in the course.

Moreover, AACPS is concerned that these proposed regulatory changes remove incentives for students to do well on the English 10 and Algebra I MCAP. The English 10 and Algebra I MCAP scores factor heavily into the Maryland School Report Cards for each AACPS school. By altering the regulations to require that students take rather than achieve a passing score on these exams, MSDE is removing an incentive for student performance. This change has the potential to negatively impact student assessment performance and school report cards.

Finally, AACPS is concerned regarding the equity issues that will be created by implementing this regulatory change as proposed. MSDE proposes to make this change effective for students entering ninth grade in the 2023-2024 school year. However, these students will be in class with classmates from other grades. AACPS proposes that this change should be implemented based on when students take the course rather than their cohort. More importantly, this change has the potential to affect students who do not take Advanced Placement (AP) courses, but not students who do. Per regulation, students who take the AP exam for government will be exempt from taking an MCAP that affects their course grade, while students who take the AP exam will be exempt from having their grade impacted by a State assessment.

AACPS requests that MSDE delay the implementation of these regulatory changes in order to address these concerns and to allow AACPS and other local education agencies sufficient time to implement the changes proposed. Thank you for your time and consideration of our comments.

Sincerely,

Grace Wilson
Legislative & Policy Specialist

cc: Dr. Mark T. Bedell, Superintendent
Michele Batten, Assistant Superintendent, Division of Curriculum and Instruction
Jason Dykstra, Executive Director, Instructional Data Division
Leigh Mann, Senior Manager, Testing Office, Instructional Data Division
Dr. Shannon Pugh, Director, Community and School Programming