



**Karen B. Salmon, Ph.D.**  
State Superintendent of Schools

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TO: Members of the State Board of Education

FROM: Karen B. Salmon, Ph.D.

DATE: July 23, 2019

SUBJECT: COMAR 13A.03.02  
*Graduation Requirements for Public High Schools in Maryland*  
**ADOPTION**

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**PURPOSE:**

The purpose of this item is to request that the State Board adopt amendments to Code of Maryland Regulation (COMAR) 13A.03.02 *Graduation Requirements for Public High Schools in Maryland*. The specific amendment to 13A.03.02.09C Exception to Passing Score Requirement extends the graduation requirement exemption for the High School Maryland Integrated Science Assessment (HS MISA) for two years.

**REGULATION PROMULGATION PROCESS:**

Under Maryland law, a state agency, such as the 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 Committee (AELR) 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, the Maryland State Department of Education (MSDE) staff reviews and summarizes the public comments. Thereafter, the MSDE staff will present a recommendation to the State Board of Education to either: (1) adopt the regulation in the form it was proposed; (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 the process, the AELR Committee may stop the promulgation process and hold a hearing. Thereafter, it may recommend to the Governor that the regulation not be adopted as a final regulation or the AELR Committee may release the regulation for final adoption.

**HISTORICAL BACKGROUND:**

The HS MISA, aligned to the Next Generation Science Standards (NGSS), integrates all three dimensions of the standards including the disciplinary core ideas, science and engineering

practices, and crosscutting concepts. The disciplinary core ideas include life science, physical science, Earth and space science content. The primary purpose of MISA is to provide high-quality science assessments to measure how well students understand grade band concepts in science. The assessment is one of several ways to help parents and teachers understand how well children are acquiring science concepts and practices. The HS MISA assesses content and practices contained in multiple high school courses, hence it is not an end of course examination.

In January 2018, the Maryland State Board of Education adopted revisions to COMAR 13A.03.02.09.C granting an exception for all students taking the HS MISA in the 2017-2018 and 2018-2019 school years because the new assessment was being developed to replace the previous High School Assessment in Biology. In addition, during this time, local school systems had been writing and implementing curriculum aligned to NGSS as well as reconfiguring their high school course sequences.

The Maryland High School Graduation Task Force first convened in January 2018 at the request of the State Board and Superintendent of Schools. The group was to make recommendations on COMAR 13A.03.02 *Graduation Requirements for Public High Schools in Maryland*. In October 2018, the Task Force report was presented to the State Board and specifically recommended students continue to be required to take the HS MISA as a participation-only graduation requirement. The Task Force also suggested a study be conducted on student assessment and course taking data to determine if there is an appropriate way to consider the HS MISA as an end of course exam. Additionally, the Task Force recommended adding the HS MISA to the Every Student Succeeds Act (ESSA) plan as an accountability measure.

The HS MISA was field tested in the 2017-2018 school year and was administered operationally in the 2018-2019 school year. Standard setting for the HS MISA will occur in August 2019 after all the data from that year's administration is compiled. It is expected that the student, school, and school system reports for the first operational year will be sent to school systems on or about November 1, 2019. Students taking the assessment in 2019-2020 would be required to pass in order to graduate.

The local school systems will be provided student, school, and system reports based on the HS MISA results. Schools will receive student scores, and local school systems will receive a school performance level summary. Information about the State, system, and school average results will be included in relevant sections of the reports to help schools and systems understand how student and school performance compares to other students and schools. Additional reports are designed to provide a more in-depth analysis of demographic and program categories with student groups' performance on the assessment and items as they relate to both the alignment to HS MISA Evidence Statements and the NGSS. With this data, school systems will have the evidence to support improvement initiatives prioritizing professional learning, resource decisions, and verifying program alignment with academic standards.

### **EXECUTIVE SUMMARY:**

System, school, and student level data is expected to be released late in the fall 2019, well after instruction has begun for the 2019-2020 school year. Local school systems will not have an opportunity to revise curricula, deliver professional learning, adjust staffing, or secure resources for HS MISA prior to the assessment impacting graduation in the spring 2020. Extending the exemption for the HS MISA as a graduation requirement will allow local school systems time to analyze the initial data from the first operational year of the HS MISA and allow students to participate in a full sequence

of courses aligned to the new assessment prior to the HS MISA counting for graduation. The potential exists for many students to be negatively impacted by the convergence of revised programs and the new assessment. In addition, the MSDE will be able to conduct a study to determine both the best sequencing of courses as well as the potential for administering HS MISA as an end of course assessment.

The State Board reviewed the amendment to the regulation and granted permission to publish at the March 26, 2019 State Board meeting. The regulation was published in the Maryland Register from June 7, 2019 until July 8, 2019. Twenty-four comments were provided by teachers, supervisors, parents, and one student (See Attachment I). All of the comments expressed support for the two-year extension of the waiver for the high school science graduation requirement. The MSDE does not recommend any changes to the proposed regulation.

**ACTION:**

Request that the State Board adopt COMAR 13A.03.02.09.C *Graduation Requirements for Public High Schools in Maryland*

Attachments:

- I. COMAR 13A.03.02.09.C *Graduation Requirements for Public High Schools in Maryland*
- II. Public Comment Summary for 13A.03.02.09.C *Graduation Requirements for Public High Schools in Maryland*/Letters

**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 Albert L. Liebno, Jr., Acting Executive Director, Maryland Police and Training Standards Commission, 6852 4th Street, Sykesville, MD 21784, or call 410-875-3602, or email to albert.liebno@maryland.gov, or fax to 410-875-3584. Comments will be accepted through July 8, 2019. A public hearing will be held on July 10, 2019, at 10 a.m., at Public Safety Education and Training Center, 6852 4th Street, Sykesville, MD 21784.

**.01 Definitions.**

A. (text unchanged)

B. Terms Defined.

(1) — (12) (text unchanged)

(13) *Mental Health Professional.*

(a) *“Mental health professional” means an individual who is certified by the appropriate health occupations board, as provided by the Health Occupations Article, §1-102, Annotated Code of Maryland, and licensed to practice:*

(i) *Medicine;*

(ii) *Psychology;*

(iii) *Clinical social work; or*

(iv) *Clinical professional counseling.*

(b) *“Mental health professional”, unless specifically stated otherwise in this chapter, includes an individual referred to as a:*

(i) *Psychiatrist licensed to practice medicine as defined in Health Occupations Article, §14-101, Annotated Code of Maryland;*

(ii) *Psychologist licensed to practice psychology as defined in Health Occupations Article, §18-101, Annotated Code of Maryland;*

(iii) *Licensed certified social worker-clinical authorized to practice clinical social work as defined in Health Occupations Article, §19-101, Annotated Code of Maryland; or*

(iv) *Certified professional counselor licensed to practice clinical professional counseling as defined in Health Occupations Article, §17-101, Annotated Code of Maryland.*

[(13)] (14) — [(18)] (19) (text unchanged)

(20) *“Psychological evaluation means:*

(a) *The administration of an assessment instrument with documented reliability, validity, and other empirical evidence intended to measure, at a minimum, an individual’s integrity, ethics, and interpersonal communication skills; and*

(b) *An in-person interview performed by a mental health professional as defined in this regulation.*

[(19)] (21) — [(21)] (23) (text unchanged)

**.04 Selection Standards for Provisional Certification.**

A. — E. (text unchanged)

F. Physical and Mental Health Examinations.

(1) Before an applicant may be selected for a position as a police officer, the applicant shall be examined by *and receive a recommendation from* a licensed, trained, and qualified medical doctor [and receive a positive recommendation from the medical doctor] indicating that the applicant is physically able to:

(a) — (b) (text unchanged)

(2) Before an applicant may be selected for a position as a police officer, [the applicant shall be examined by a licensed, trained,

and qualified mental health care professional and receive a positive recommendation from the mental health care professional] *a mental health professional shall conduct a psychological evaluation of the applicant and offer a positive recommendation* indicating that the applicant is:

(a) — (b) (text unchanged)

(3) (text unchanged)

G. — K. (text unchanged)

ROBERT L. GREEN

Secretary of Public Safety and Correctional Services

**Title 13A  
STATE BOARD OF  
EDUCATION**

**Subtitle 03 GENERAL  
INSTRUCTIONAL PROGRAMS**

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

Authority: Education Article, §§2-205, [4-110, 4-111,] 7-203, 7-205, 7-205.1, [7-206,] and 8-404, Annotated Code of Maryland

**Notice of Proposed Action**

[19-101-P]

The Maryland State Board of Education proposes to amend Regulation .09 under **COMAR 13A.03.02 Graduation Requirements for Public High Schools in Maryland**. This action was considered at the March 26, 2019, meeting of the State Board of Education.

**Statement of Purpose**

The purpose of this action is to extend the graduation requirement exemption for the High School Maryland Integrated Science Assessment by 2 years.

**Comparison to Federal Standards**

There is no corresponding federal standard to this proposed action.

**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 Bruce Lesh, Director of Instructional Programs, Division of Curriculum, Assessment and Accountability, Maryland State Department of Education, 200 West Baltimore Street, Baltimore, MD 21201, or call 410-767-0519 (TTY 410-333-6442), or email to bruce.lesh@maryland.gov. Comments will be accepted through July 8, 2019. 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 23, 2019, 9 a.m., at 200 West Baltimore Street, Baltimore, MD 21201.

**.09 Diplomas and Certificates.**

A.—B. (text unchanged)

C. Exception To Passing Score Requirement.

(1)—(2) (text unchanged)

(3) For all students taking the Maryland Integrated Science Assessment in the 2017—2018 [and], 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)

KAREN B. SALMON, Ph.D.  
State Superintendent of Schools

**Subtitle 03 GENERAL  
INSTRUCTIONAL PROGRAMS**

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

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

**Notice of Proposed Action**

[19-100-P]

The Maryland State Board of Education proposes to amend Regulations .01, .03, and .04 under **COMAR 13A.03.04 Test Administration and Data-Reporting Policies and Procedures**. This action was considered at the March 26, 2019 meeting of the State Board of Education.

**Statement of Purpose**

The purpose of this action is to update the list of tests administered by the MSDE, clarify that “security” and “monitoring” apply to all instruments administered by the MSDE, clarify that personnel should be trained at least annually in test administration policy and procedures, and clarify eligibility requirements for Local Accountability Coordinators, School Test Coordinators, Test Administrators, Proctors, and Accommodators.

**Comparison to Federal Standards**

There is no corresponding federal standard to this proposed action.

**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 Dr. Tamara Lewis, Assessment Specialist/Test Security Officer, Assessment Branch, Maryland State Department of Education, 200 West Baltimore Street, Baltimore, MD 21201, or call 410-767-0074 (TTY 410-333-6442), or email to tamara.lewis@maryland.gov, or fax to 410-333-0052. Comments will be accepted through July 8, 2019. 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 23, 2019, 9 a.m., at 200 West Baltimore Street, Baltimore, MD 21201.

**.01 Scope.**

This chapter applies to:

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

[(1) The Partnership for Assessment of Readiness for College and Career (PARCC) Assessments;

(2) The Maryland School Assessment (Science);

(3) The Alternate Maryland School Assessment (Science);

(4) The Alternate Maryland School Assessments (Reading and Mathematics), which will be replaced by the National Center and State Collaborative Assessments for Reading and Mathematics in school year 2016—2017;

(5) The Maryland High School Assessments (Government and Science);

(6) The Kindergarten Readiness Assessment;

(7) The norm-referenced test or tests in use by the State;

(8) The Educator Credentialing Tests; and

(9) Other test instruments required by the State Board of Education;]

(1) *The Maryland Comprehensive Assessment Program (MCAP) (English and Language Arts and Mathematics);*

(2) *The Maryland Integrated Science Assessment (MISA) for grades 5 and 8;*

(3) *The Alternate Maryland Integrated Science Assessment (Alt-MISA);*

(4) *The Multi-State Alternate Assessment (MSAA);*

(5) *The High School Assessment for Government (HSA Government);*

(6) *The High School Assessment for Science (HS MISA);*

(7) *The Kindergarten Readiness Assessment (KRA);*

(8) *The English Language Proficiency Assessment (ELPA) — ACCESS for ELLs;*

(9) *The norm-referenced test or tests in use by the State;*

(10) *The Educator Credentialing Tests; and*

(11) *Other instruments required by the State Board of Education;*

B. Data reporting required by the State Board of Education including the data-based areas described in COMAR 13A.01.04 and other measures used to determine availability of services and funding; [and]

C. Local school system-owned materials that are the same as those used in any State-operated assessment program[.]; and

D. *The security and monitoring of any instrument administered by or through the State Board of Education, to include assessments and surveys.*

**.03 Local School System Test Administration and Data-Reporting Policies.**

A. (text unchanged)

B. The test administration policy shall provide for:

(1) — (2) (text unchanged)

[(3) Annual training of appropriate personnel on the local test administration policy and procedures; and]

(3) *Training, at least annually, of appropriate personnel on test administration policy and procedures;*

(4)—(5) (text unchanged)

C. — E. (text unchanged)

**.04 Local School System Testing Designates.**

A. *All personnel involved in testing shall be employees of the local school system, be trained for their role, meet the requirements of their role as described herein, and sign a Department approved Test Administration and Certification of Training Form.*

B. *Personnel may not serve as a Test Administrator, Proctor, or Accommodator in the same testing room as a student who is a family member or who resides within the same dwelling.*

## Public Comment Summary

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

Individual/Organization	Comment	MSDE Response
Jamie Rowder Huntingtown High School	As a science teacher I am concerned about the MISA counting towards graduation. I do not feel that we have enough data to support the changes our county has made to determine if we are meeting the needs of our students in regard to the new expectations. Please allow us more time to collect data and revise curriculum before students are held responsible for our learning curve. Thank you for your consideration.	Accepted
Ethan Jennings Chemistry Teacher Science Department Chairperson Harford Technical High School	<p>I strongly support delaying the MISA high school graduation requirement. School districts have not had any opportunity to review MISA data and modify their new NGSS-aligned curricula accordingly.</p> <p>I also strongly support changing the assessment itself so that it only assesses a single course (ie biology, chemistry, physics or Earth science) and is given to students after completion of that course. To expect students to be proficient in standards that they learned 3 years prior is unreasonable. We don't expect college students to do that. In fact, if MISA were to be given to high school science teachers, most teachers would find it exceptionally difficult as most high school science teachers are only trained in 1 particular science discipline. It seems unfair for students to pass a test that their own teachers would likely struggle with.</p>	Accepted
Laurie Donaldson Harford County Public schools	<p>I am writing in favor of the proposed changes to <u>13A.03.02 Graduation Requirements for Public High Schools in Maryland</u>.</p> <p>As a high school science teacher with 31 years of experience, I believe that an extension of the time needed to understand what will be tested and how to prepare students for that test is warranted. I was teaching in Harford County when the Maryland HSA tests began and there was also a period of a couple of years then when passing scores were waived and the only requirement was to take the test. The extra time allows teachers to assess data for at least a couple of years and understand which areas may need extra attention in the classroom. Except for a few questions that I assume were rejected items for the practice test, we have not seen the current test and the counties have not had time to make sample practice test questions to help students prepare.</p> <p>An extra two years will be a great help to both teachers and students to ensure success on these new high school tests.</p>	Accepted
Cynthia L. Perouty Century High School Carroll County	<p>I believe that postponing the graduation requirement for the new HS MISA is a prudent opportunity for teachers and administrators to view student progress over a few years to help with the adjustment to the new assessment. This was done for the HSA long ago and provided teachers with data to see how they and their students were progressing. By doing so, teachers could "tweak" their pedagogy in preparing students for the test.</p> <p>Please consider postponing the graduation requirement to 2022.</p>	Accepted
Charlene Johnson Calvert County Public Schools	Our district has created a new class curriculum to fulfill the large amount of content that will be included on the MISA. We have only had 2 years to try and build material and changes for the MISA, but we still have not been given any data to guide instructional changes. If we as educators can't see how our students have done for the last 2 years, how are we supposed to better prepare them? We need more time to create MISA- like assessments as well as be given data to review to understand how students have done before this is a graduation requirement.	Accepted

## Public Comment Summary

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

Individual/Organization	Comment	MSDE Response
Suzanne Kistler Science Core Lead Calvert High School	I have been a Science Core lead in Calvert County public schools for 10 years and served as the science department chair for 12 years prior to evolution of the Core Lead position. I am increasingly concerned about the MISA becoming a graduation requirement during the next school year. My main areas of concern are the lack of data provided to local districts that would allow us to prepare students for success, the limited amount of time districts have had to revise curriculum to meet the demands of the test in two years of science instruction and the lack of time and training we have provided teachers to create MISA-like items with which to practice. Having two more years to work on these items will better assure that more students have a chance to be successful on the MISA.	Accepted
Debby Heyes Physics Teacher Huntingtown High School Calvert County	As a Maryland public school secondary science teacher, I urge you to consider postponing the date for which passing the MISA becomes a graduation requirement for these reasons: <ol style="list-style-type: none"> <li>1. Districts do not have any data to guide instructional changes that will allow us to prepare students for success.</li> <li>2. Districts are still revising curriculum and course sequences to align with NGSS.</li> <li>3. Districts are still working to create MISA-like assessment that will expose students to the types of questions that they will see on the MISA.</li> </ol>	Accepted
David Redden Calvert High School Prince Frederick, MD	My name is David Redden and I currently teach at Calvert High School in Calvert County. I have taught all topics of science for the last 27 school years and I am very concerned about the MISA becoming a graduation requirement during the next school year. My main areas of concern are the lack of data provided to local districts that would allow us to prepare students for success, the limited amount of time districts have had to revise curriculum to meet the demands of the test in two years of science instruction and the lack of time and training we have provided teachers to create MISA-like items with which to practice. Having two more years to work on these items will better assure that more students have a chance to be successful on the MISA.	Accepted
Chuck Gustin Calvery County	I have been a Science Teacher in Calvert County public schools for 26 years. I am increasingly concerned about the MISA becoming a graduation requirement during the next school year. My main areas of concern are the lack of data provided to local districts that would allow us to prepare students for success, the limited amount of time districts have had to revise curriculum to meet the demands of the test in two years of science instruction and the lack of time and training we have provided teachers to create MISA-like items with which to practice. Having two more years to work on these items will better assure that more students have a chance to be successful on the MISA.	Accepted
Dave Kistler Biology Teacher Fall Strength Coach Calvert High School	I have been a Science Teacher in Calvert County public schools for 30 years. I am increasingly concerned about the MISA becoming a graduation requirement during the next school year. My main areas of concern are the lack of data provided to local districts that would allow us to prepare students for success, the limited amount of time districts have had to revise curriculum to meet the demands of the test in two years of science instruction and the lack of time and training we have provided teachers to create MISA-like items with which to practice. Having two more years to work on these items will better assure that more students have a chance to be successful on the MISA.	Accepted

## Public Comment Summary

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

Individual/Organization	Comment	MSDE Response
Stephen R. King Science Instructor	<p>I have been an educator for 30 years and the last 25 of which in Calvert County public schools. I was an administrator for 10 years, but I recalled why I got into education in the first place and returned back to the classroom for the last 10 years.</p> <p>I am increasingly concerned about the MISA becoming a graduation requirement during the next school year. As an instructor we are contently altering lessons based on student feedback. Educators are looking to evaluate if learning has taken place and if not, what steps must be taken to reteach needed concepts. My concern with the MISA becoming a graduation requirement is the lack of data provided to local districts that would allow us to prepare students for success! What areas is my instruction strong? What areas are the students failing to retain after instruction has taken place? Under the current plan, those gaps will remain because I will not have had any meaningful data from the state to assess my instruction and what changes that instruction will require in order to enable student success in the MISA. The current state plan will limit the amount of time districts have had to revise curriculum to meet the demands of the test in two years of science instruction. Additionally, it will not allow for training needed in order to assist teachers to create MISA-like items with which to practice.</p> <p>Rolling out a change with this level of sophistication of testing, the vast variety of information being tested, and the means in which the tests is administered takes time. It cannot be rushed at the expense of students. Having two more years to work on these items will better assure that more students have a chance to be successful on the MISA. Ultimately, high stakes testing cannot be rushed!</p>	Accepted
Kay Redman Calvert High School Matter & Energy Teacher	<p>I have been a science teacher in Calvert County Public Schools for 28 years with the majority of those years, 25, at the middle school level and the last 3 at the high school level. I am concerned about the MISA becoming a graduation requirement during the next school year. The lack of data provided to local districts that would allow us to analyze areas of strengths/weaknesses, create goals, and prepare students for success is glaringly contradictory to the data-driven approach that has informed educational decisions for quite some time now. The limited amount of time districts have had to revise curriculum to meet the demands of the test in two years of science instruction and the lack of time and training teachers have been given to create MISA-like items also contribute to my concern. Without these structures solidly in place, I am anxious that students will fall short of the, as yet unknown, bar set before them and us, their teachers. Having two more years to work on these items will better assure that more students have a chance to be successful on the MISA.</p>	Accepted
Jamaal Custis Student	<p>I'm contacting to you because I heard that you guys are honking about making the MISA test a graduation requirement. I think you shouldn't consider this because, not everyone is going to be able to pass this test on their first try, and a lot of people are probably not going to take a certain science class that breaks down or teaches them what is going to be on the MISA test. I also wanted to say was, I already took the MISA test when I was going to school in the city. Now that I live in the county I wanted to know if I'm still going to have to take this test after I already took and I passed the test.</p>	Accepted
Julie Damico	<p>I am requesting that the Maryland State Board of Education approve the proposed change to extend the graduation requirement exemption for the High School Maryland Integrated Science Assessment by (at least!!) 2 years.</p>	Accepted

## Public Comment Summary

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

Individual/Organization	Comment	MSDE Response
<p>Nancy Vesey Parent of Howard County Public school student</p>	<p>I am a parent of a child who attends Howard County Public Schools. I would like to voice my concern over the MISA Science test that is now a requirement in order to graduate high school. My concerns center around over taxing and over testing our students for unnecessary purposes.</p> <p>I understand that Howard County Board of Education wants to ensure that the students in their schools attain a certain level of knowledge and proficiency in various subjects before they graduate high school. However, I believe this goal can be met by other means than standardized testing. Regarding the subject of Science there is no clear benefit or need in everyday life for many of the topics covered in the MISA test. Only those students who want to pursue Science related fields or work past high school will need to be concerned with the topics in the MISA test.</p> <p>If children are required to take Earth Science, Biology and Chemistry then they are being evaluated and tested in those courses during the year in which they take them. If they get a passing grade in those classes, it is clear that they have achieved a level of proficiency. The county can use data from the number of kids who pass and those who fail those classes in order to determine if children are getting adequate instruction and achieving proficiency. A standardized test is not necessary. Why do the students need to take the MISA well after they have taken some of those courses covered in the test, in order to prove that they are proficient? As time goes by students do not remember most information and formulas, etc., from their Science classes and that makes the test difficult to pass. Since it is a requirement to pass that means there should be classroom time devoted to reviewing material and doing practice tests and having the student study outside of class. All of this time could be better spent learning current material. For instance, Biology or Chemistry teachers will need to take time out of their regular classroom curriculum teaching to go over and prepare students for the test. If no review by current teachers is given, then you are not setting students up for success because the information is not generally of the nature that the average student will retain it when they are one or more years removed from the class. Adding this test is another layer of bureaucracy and unnecessary testing and adds time and money into the school budget. It is a hoop you are making the students jump through.</p>	<p>Accepted</p>
<p>Anton Smith Franklin High School</p>	<p>As a science educator in Baltimore County I would like to share my opinion that the no-fault MISA testing window be extended.</p>	<p>Accepted</p>
<p>Tina H. Lure <a href="mailto:tlure@bcps.org">tlure@bcps.org</a> 443-809-0133 The Rosedale Center Baltimore County Public Schools</p>	<p>It is my understanding that there is some discussion around extending MISA as a graduation requirement for an additional 2 years. As a science teacher in my 25<sup>th</sup> year, I wholeheartedly support this idea. The switch to NGSS standards and the instructional changes that accompany this change are a significant shift in how we have historically taught science. Additionally, this comes at the same time that that school systems are digitizing curriculums, requiring teachers to completely revamp curricula and instructional practices. In addition, students are struggling with these massive shifts as well. The added two years would give systems, teachers and students the time to modify, adjust and accommodate learning to new curriculum, methodologies, pedagogy and requirements before they had to worry about this being a graduation requirement.</p> <p>This is not a small shift in mindset- it is massive. Maryland needs time to make a successful adjustment!</p>	<p>Accepted</p>

## Public Comment Summary

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

Individual/Organization	Comment	MSDE Response
Ella Reid Teacher Baltimore County Public Schools	I vote to extend MISA for another two years.	Accepted
Dr. Yovonda Kolo Supervisor of Science and STEM Calvert County Public Schools	<p>I am sending this email in favor of asking for a 2- year extension of the Science Graduation Requirements related to MISA.</p> <ul style="list-style-type: none"> <li>• Below are my 3 overall concerns:</li> <li>• Districts do not have any data to guide instructional changes that will allow us to prepare students for success.</li> <li>• Districts are still revising curriculum and course sequences to align with NGSS.</li> <li>• Districts are still working to create MISA-like assessment that will expose students to the types of questions that they will see on the MISA.</li> </ul>	Accepted
John Urban Calvert County Public Schools	<p>My name is John. I teach biology for Calvert County Public Schools. I wanted to express my concern for the MISA being a graduation requirement as early as next year.</p> <p>My concerns are similar to many other teachers. I feel that there is a lack of data based on performance of students that have already taken the MISA communicated to teachers to inform our instruction.</p> <p>There has not been enough time (or data) to make sufficient adjustments to our curriculum and instruction in the two years the MISA has been administered. It feels like we are asked to start sailing the ship while we are still construction it.</p> <p>There has been a lack of professional development as far as helping teachers to develop instructional activities to prepare students for the demands of the MISA and to produce MISA-like common assessments.</p> <p>When I compare what is going on now to how the Biology HSA was rolled out, I see a lot of stark contrast.</p> <p>First of all, the first administration of the Biology HSA was in 2002 (I believe). I didn't begin teaching in Maryland until 2004, so the HSA, or some precursor to it, may have been on the scene sooner. Yet, the first graduating class that had to pass it was the class of 2009, at least 7 years of data collection, sample release questions, and professional development after the introduction of the test. I know I taught several years in which students only had to sit for the exam, and I was not here at the onset of the Biology HSA. The first class that sat in front of me that had to pass the HSA wasn't until the 2006-07 school year, at least 5 years after the first administration.</p> <p>There was also excellent professional development, such as the Governor's Academy, which I thought really prepared me to prepare my students.</p>	Accepted

## Public Comment Summary

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

Individual/Organization	Comment	MSDE Response
	<p>The curriculum for the Biology HSA was also incredibly concise and straight forward, basically a dream guide for a new teacher in my opinion. In contrast, the MISA and NGSS seem to be much more cumbersome in demands. They are also obviously more demanding in the scope of content since they cover four disciplines that takes at least two years of science instruction instead of just one. This also has the impact of including teachers that may have never dealt with such a high stakes exam.</p> <p>So, with all this considered, what makes anyone think that we will be ready to implement this test for something as important as a graduation requirement in such a short time? The past few years have been nice in that it has allowed us to take some responsible risks as we transition. We could really benefit in the long run from maintaining this change conducive environment for a few more years as we continue the transition. We all want to do what is in the best interest of students. I fear that rushing this process isn't going to be good for anyone.</p>	
<p>Jim Peters Carroll County Public Schools</p>	<p>Although CCPS is ready to take the HS MISA, postponing it counting for graduation would help us react to data and make meaningful curriculum adjustments as needed.</p>	<p>Accepted</p>
<p>Mary Weller, Coordinator, Secondary Science Howard County Public School System</p>	<p>The Howard County Public School System (HCPSS) supports the proposal to amend section .09 of COMAR 13A.03.02 to extend the graduation requirement exemption for the High School Maryland Integrated Science Assessment (MISA) by two years. The Maryland Next Generation Science Standards (NGSS) have rightly and dramatically elevated the goals of science education by emphasizing scientific literacy for all students. Since Maryland's adoption of NGSS in 2013, HCPSS teachers and students have committed themselves to successful attainment of the standards, and the science learning experiences for students in all grades have been refined based on reputable science education research. Yet, progress toward fulfilling the goals of NGSS has not been validated with objective student performance measures, and the fact that results from the 2018-19 High School MISA will not be returned to educators within the school system until well after the start of the 2019-20 school year is concerning. Lessons learned from these results cannot be thoughtfully implemented until the 2020-21 school year. Thus, students in 2019-20 will be placed in a precarious, high stakes testing situation before educators have had ample opportunity to implement data informed changes unless the amendment is made. The National Research Council's "Committee on Developing Assessments of Proficiency in K12 Science" advised NGSS-adopting states to implement assessment for NGSS gradually so that the goals of NGSS are not lost. Extending the graduation requirement exception for high school MISA will allow informed iteration of high school instructional programming and demonstrate Maryland's deep commitment to the highest quality learning experiences for all students.</p>	<p>Accepted</p>
<p>Cynthia Simonson Montgomery County Council of Parent Teacher Associations</p>	<p>We are pleased the BOE is reviewing the current COMAR language and ask the attached letter be included in the record. While our original request was for one year, we are satisfied with MSDE's current recommendation of a 2 year stay before "passing" is required. We ask that during this two-year period, MSDE engage in conversations with stakeholder groups about the value of a multi-year test that doesn't necessarily have cumulative aspects. MCCPTA board members, on behalf of our 45,000 members, would be pleased to participate in such a dialogue. Many thanks for the opportunity to weigh in on this important point.</p>	

## Public Comment Summary

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

Individual/Organization	Comment	MSDE Response
<p>Office of the Chief Academic Officer Montgomery County Public Schools</p>	<p><b>Summary</b> The Maryland State Board of Education proposes to amend Regulations .09 under COMAR 13A.03.02 Graduation Requirements for Public High Schools in Maryland, to extend by two years the graduation requirement exemption for the High School Maryland Integrated Science Assessment (HS MISA). Montgomery County Public Schools (MCPS) wishes to express support for and comment on the proposed regulation.</p> <p><b>MCPS Comments:</b></p> <ul style="list-style-type: none"> <li>• MCPS supports this extension. System, school, and student level data are expected to be released late in fall 2019, well after instruction has begun for the 2019–2020 school year. Local school systems will not have an opportunity to revise curricula, deliver professional learning, adjust staffing, or secure resources for HS MISA, and therefore MCPS supports this amendment that the graduation requirement exemption be extended for students taking the HS MISA in the 2019–2020 and 2020–2021 school years.</li> <li>• Extending the exemption for the HS MISA as a graduation requirement would allow local school systems time to analyze the data from the initial operational years of the HS MISA and allow students to participate in a full sequence of courses aligned to the new assessment prior to a score on the HS MISA counting for graduation. The potential exists for many students to be negatively impacted by the convergence of revised programs and the new assessment.</li> <li>• MCPS also encourages the Maryland State Department of Education (MSDE) to use the two-year extension to study the various course sequences and instructional models that have been developed across the state to align to the HS MISA. The design of an integrated assessment, as opposed to end-of-course exam, has led to wide variance in aligned courses, course sequences, and the grade level of test administration across LEAs. MSDE should use this two-year extension to study best practices of courses, course sequences, and timing of the HS MISA and issue more specific guidance to districts.</li> <li>• MCPS also encourages MSDE to use the two-year extension to study the process for awarding transfer credits from LEAs within Maryland. If each LEA will be testing their students after a different sequence of courses, more specific processes for awarding transfer credits within a science sequence needs to be developed.</li> <li>• In addition, MSDE should consider allowing alternate assessments that meet the high school science assessment requirement, such as qualifying scores on Advanced Placement or International Baccalaureate exams in science.</li> </ul>	<p>Accepted</p>

## Public Comment Summary

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



February 20, 2019

To Whom It May Concern:

As the Montgomery County Council of Parent-Teacher Associations (MCCPTA), we request your immediate attention to the COMAR outlining the assessments necessary to meet Maryland High School graduation requirements.

Specifically, we are concerned about the current requirement wherein students taking the Maryland Integrated Science Assessment (MISA) in 2019-20 school year (and after) must pass the assessment to meet the Maryland Graduation Requirements. Over the last few months, on behalf of our association of parents, teachers, and students, our leadership has been asking for clarification about what score is passing for this particular assessment. We are troubled to learn cut scores will not be available until after August 2019.

For a "high stakes test," this timing is not adequate for teachers to support our students. Teachers use prior year results to identify areas that may require re-teaching and/or gaps in the current curriculum that may need attention. Of equal concern, at this time MSDE has not defined the Bridge option that will be available to students. This creates a tremendous amount of anxiety for students that for one reason or another may require alternate means to demonstrate proficiency. Currently, there is no firm date for when State-developed, Statewide Bridge scoring protocols will be released.

We believe we all want the same thing – to see our students successfully meet the challenges placed before them. But, with the delayed release of information from MSDE, we respectfully request the following provision be amended to include an additional year, 2019-2020, wherein taking the MISA will meet the graduation assessment requirement for science.

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

On behalf of our organization and the students we serve, thank you for your consideration of this request. If you have any questions, please don't hesitate to reach out to me for clarification at [vpeducation@mccpta.org](mailto:vpeducation@mccpta.org) or by phone at 301.503.1044.

Respectfully,

A handwritten signature in black ink, which appears to read "Cynthia Simonson". The signature is fluid and cursive.

Cynthia Simonson  
MCCPTA Vice President of Educational Issues

cc: MCCPTA Board of Directors

## **Public Comment Summary**

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



**COMAR 13A.03.02 Graduation Requirements  
for Public High Schools in Maryland**  
Comments from the Office of the Chief Academic Officer  
Montgomery County Public Schools  
Rockville, Maryland

**Summary**

The Maryland State Board of Education proposes to amend Regulations .09 under COMAR 13A.03.02 Graduation Requirements for Public High Schools in Maryland, to extend by two years the graduation requirement exemption for the High School Maryland Integrated Science Assessment (HS MISA). Montgomery County Public Schools (MCPS) wishes to express support for and comment on the proposed regulation.

**MCPS Comments:**

- MCPS supports this extension. System, school, and student level data are expected to be released late in fall 2019, well after instruction has begun for the 2019–2020 school year. Local school systems will not have an opportunity to revise curricula, deliver professional learning, adjust staffing, or secure resources for HS MISA, and therefore MCPS supports this amendment that the graduation requirement exemption be extended for students taking the HS MISA in the 2019–2020 and 2020–2021 school years.
- Extending the exemption for the HS MISA as a graduation requirement would allow local school systems time to analyze the data from the initial operational years of the HS MISA and allow students to participate in a full sequence of courses aligned to the new assessment prior to a score on the HS MISA counting for graduation. The potential exists for many students to be negatively impacted by the convergence of revised programs and the new assessment.
- MCPS also encourages the Maryland State Department of Education (MSDE) to use the two-year extension to study the various course sequences and instructional models that have been developed across the state to align to the HS MISA. The design of an integrated assessment, as opposed to end-of-course exam, has led to wide variance in aligned courses, course sequences, and the grade level of test administration across LEAs. MSDE should use this two-year extension to study best practices of courses, course sequences, and timing of the HS MISA and issue more specific guidance to districts.
- MCPS also encourages MSDE to use the two-year extension to study the process for awarding transfer credits from LEAs within Maryland. If each LEA will be testing their students after a different sequence of courses, more specific processes for awarding transfer credits within a science sequence needs to be developed.
- In addition, MSDE should consider allowing alternate assessments that meet the high school science assessment requirement, such as qualifying scores on Advanced Placement or International Baccalaureate exams in science.

**Office of the Chief Academic Officer**



TO: Bruce Lesh  
Director of Social Studies, Science and Disciplinary Literacy

FROM: Mary Weller,  
Coordinator, Secondary Science  
Howard County Public School System

Date: July 3, 2019

To Whom it May Concern,

The Howard County Public School System (HCPSS) supports the proposal to amend section .09 of COMAR 13A.03.02 to extend the graduation requirement exemption for the High School Maryland Integrated Science Assessment (MISA) by two years.

The Maryland Next Generation Science Standards (NGSS) have rightly and dramatically elevated the goals of science education by emphasizing scientific literacy for *all* students. Since Maryland's adoption of NGSS in 2013, HCPSS teachers and students have committed themselves to successful attainment of the standards, and the science learning experiences for students in all grades have been refined based on reputable science education research. Yet, progress toward fulfilling the goals of NGSS has not been validated with objective student performance measures, and the fact that results from the 2018-19 High School MISA will not be returned to educators within the school system until well after the start of the 2019-20 school year is concerning. Lessons learned from these results cannot be thoughtfully implemented until the 2020-21 school year. Thus, students in 2019-20 will be placed in a precarious, high-stakes testing situation before educators have had ample opportunity to implement data-informed changes unless the amendment is made.

The National Research Council's "Committee on Developing Assessments of Proficiency in K12 Science" advised NGSS-adopting states to implement assessment for NGSS gradually so that the goals of NGSS are not lost. Extending the graduation requirement exception for high school MISA will allow informed iteration of high school instructional programming and demonstrate Maryland's deep commitment to the highest quality learning experiences for all students.



February 20, 2019

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On behalf of our organization and the students we serve, thank you for your consideration of this request. If you have any questions, please don't hesitate to reach out to me for clarification at [vpeducation@mccpta.org](mailto:vpeducation@mccpta.org) or by phone at 301.503.1044.

Respectfully,

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Cynthia Simonson  
MCCPTA, Vice President of Educational Issues

cc: MCCPTA Board of Directors