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TO: Members of the State Board of Education

FROM: Karen B. Salmon, Ph.D. *KBS/CLW*

DATE: October 25, 2016

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

PURPOSE:

The purpose of this action is to request that the State Board approve the amended regulation for *Graduation Requirements for Public High Schools in Maryland*. The amended regulation proposes to establish the passing scores for the Algebra I and English 10 as graduation requirements, with planned incremental increases to the pass scores for certain school years, and to provide exemptions to assessment requirements for Algebra I, English 10, and Biology to certain students in certain years.

REGULATION PROMULGATION PROCESS:

Under Maryland law, a state agency, such as the State Board, may propose a new 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 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 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.

BACKGROUND/HISTORICAL PERSPECTIVE:

In spring 2014, MSDE began the administration of the high school Partnership for the Assessment of Readiness for College and Careers (PARCC) assessments. Beginning that year, and continuing through spring 2016, the requirement to pass the High School Assessment (HSA) English 10, and the HSA Algebra I for a Maryland diploma was suspended as the local school systems completed the alignment of curriculum and instruction to the Maryland College and Career Ready Standards, and as assessments were refined to operational status. This amendment proposes to now replace those HSAs with the corresponding PARCC assessments, beginning with first-time test takers in the 2016-2017 school year as graduation requirements. The amendment further proposes specific scale score

standards for each of the two PARCC tests, which would be increased incrementally over a three-year period for successive school years. Finally, the amendment suspends the pass requirement for the Biology HSA, requiring only participation in the 2016-2017 administration, in order to meet the graduation requirement.

Thirty-five comments were received. The scheduled raising of the pass score on the Algebra I and English 10 assessments was the primary topic of comment for nearly all submissions. Twenty-seven respondents expressed concern or non-support for the planned increases. This aspect of the amendment is worthy of additional discussion and consideration by the Board as the year progresses.

EXECUTIVE SUMMARY:

The adoption of revised graduation requirements serves to reestablish a summative assessment as an important component of demonstrated achievement in obtaining a Maryland High School Diploma.

ACTION:

It is recommended the Board adopt the regulation.

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Public Comments on Graduation Requirements

	Commenter	Comments
1.	<p>Ginger Wilson Special Education Teacher Crisfield Academy & High School gwilson@somerset.k12.md.us 410-968-0150</p>	<p>Good morning! My name is Ginger Wilson and I am a special education teacher at Crisfield High School in Somerset County, MD. I have co-taught all math classes offered to our high school students and participated in state testing. Testing our students is a priority of the state and a graduation requirement. All students are expected to be college or career ready prior to graduation; this looks differently for each student and his/her interests. Many students feel that math is a challenging subject and it is my job to encourage them to push themselves harder and farther than they have ever been before. Attaining a "3" on the Algebra test is a very challenging goal for almost all of my students. It is difficult, but attainable. However, raising the graduation requirement to a "4" will most definitely prove to be impossible to my students, causing an exorbitant amount of Algebra Bridge projects. I strongly believe that the standard of "3" as a graduation requirement is sufficient to meet the Career Readiness Standard, and that requiring a "4" would only be met by those who are College bound.</p>
2.	<p>Terry A. Drechsler Supervisor of Secondary Mathematics Local Accountability Coordinator 7982A Tawes Campus Drive Westover, Maryland 21871 Phone: 410-621-6275 Cell: 410-603-9368</p>	<p>While I do believe that all students should be College and Career Ready by the time they leave high school, I don't think that's being realistic. There are numerous students in the State of Maryland, who will be successful without going to any formal training outside of high school. We also have students who have test anxiety who struggle to be successful on tests. I would like to see that all students have access to graduation, by leaving the passing score for Algebra I and English II a 3 rather than gradually increasing the score to a 4. While we did see modest gains in Algebra I, I don't know that we saw enough gains to say that we will have the majority of our students achieving a 4 for passing in that short amount of time. I think that we should currently stay with a 3 for passing Algebra I. I also think the sliding scale will cause confusion for graduation. It's going to be hard enough for high school counselors to determine if a student have the required assessments for graduation, without having to worry about do they have the passing score for that assessment, based on the initial year they took the assessment. In addition, this will cause confusion for</p>

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<p>parents who have several students going through high school. Why did one child have to get this score to pass while another had to get a different score.</p> <p>Let's leave the passing score at a 3 for several year and then re-evaluate. If we find we can move to a 4, then we can do so. By that time, the new science assessment should be in place so changes can be made by looking at all three assessments. It's easier to raise scores passing scores later, than to have to reduce them later.</p>	
<p>3. Michael J. Fell 443-350-5112 Cecil County, MD</p> <p>I am strongly concerned about the proposed language in 13A.03.02.09 Diplomas and Certificates that states:</p> <p>Changing the passing score from 725 to a 750 over this time frame is harmful to students. I would ask the state board to strongly consider the fact that this test is a graduation requirement and passing the test (725) is not the same as mastering the test (750). Moving the score to 750 is analogous to saying that students need a B to graduate. Therefore, I ask that the State Board remove (ii) (iii) and (iv) and reword .09 to establish the 725 as the passing score. Another part of the proposed regulation states that the state board will review annually and so let's wait until we get some actual data until key graduation decisions are made. Establish the passing score as 725 and please leave it there.</p> <p>I would ask the state board to consider the following as I ask them to maintain the 725:</p> <ol style="list-style-type: none">1. PARCC Algebra 1 keeps changing. The latest iteration of their PLD documents was done on March 31, 2016. PARCC is not even sure what is "fair."2. There is a huge difference between student paper-pencil scores vs. online scores by PARCC's own data. How would this be fair for all students, especially when the test is scaled?3. Consider the number of bridge plans that would have to be done by schools when students fail to meet 750. By the state's own numbers, this could be nearly 70% of students state-wide. This could place a huge	

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<p>burden on schools.</p> <p>4. And please consider that this is just one test taken by our high school students as mandated by MSDE and ESSA. They take English 10, Biology, and Government as graduation requirements along with Algebra 1. They take Geometry, English 11, Algebra 2, Accuplacer, and the SAT to fulfill SB740, and then test again as seniors on some of these same tests. We all certainly understand accountability, but are we indeed over-testing?</p> <p>5. The HSA Algebra 1 number of 412 = the PARCC Algebra 1 number of 725, according to the psychometricians. And PARCC Algebra 1 actually contains some algebra 2 skills and concepts. It is a harder test.</p> <p>6. Finally, but not rhetorically, what is the reasoning behind the 750? Is it just to align with the "college and career ready" number set by PARCC? If so, I would humbly ask the state board to reconsider why we would align with PARCC with this singular high stakes mathematics test for all and disregard the psychometricians and potentially do harm to many Maryland students.</p> <p>Everyone recognizes the need for high expectations. I have been a mathematics educator for over 30 years and have won numerous awards. Both of my sons were valedictorians. My entire career was based on establishing high expectations for students through positive relationships. I taught everything from Algebra 1 through AP Calculus BC. But the change to PARCC has been flawed from the beginning. Promises from MSDE regarding math resources never materialized. PARCC diagnostics were never implemented by our district due to issues from PARCC. PARCC sample tests were just re-released today (September 2, 2016.) PARCC will change again, so let's make this fair for students and establish the 725 as the passing score for 16-17 and beyond.</p>	
<p>It is my belief that there can be a difference between (1) Academic achievement sufficient for earning a high school diploma, and (2) Academic achievement that is considered to be college and career ready.</p> <p>The achievement of a "3" on the PARCC Algebra 1 assessment is a significant achievement. I believe that earning a "3" on this test is an</p>	<p>4. Peter Cincotta President Maryland Council of Supervisors of Mathematics Curriculum Specialist for Secondary Mathematics Frederick County Public Schools 191 South East Street Frederick, Maryland 21701</p>

	<p>(phone) 301 – 644 – 5057 Peter.cincotta@fcps.org Twitter: @cincottapeter Blog: http://whatsgoodaboutpubliceducation.blogspot.com/</p>	<p>acceptable minimum for the state of Maryland to say that a student is sufficiently versed in Algebra 1 content. At the same time, PARCC has designated a score of “4” or “5” as being prepared for the first credit-bearing math course in college—with which I also agree.</p> <p>Additionally, a score of a “3” on the PARCC Algebra 1 assessments is a significantly higher achievement than earning the minimal passing score on the HSA Algebra 1 assessment. This is because the content assessed on the PARCC Algebra 1 assessment is of a higher level and more rigorous than that on the HSA Algebra 1 assessment.</p>
<p>5.</p>	<p>Kelly Sullivan Secondary Math Professional Development Coach Wicomico County Public Schools MMHS (3052) and WHS (2819)</p>	<p>I am opposed to the arbitrary increase in scores required for students to achieve “passing” status on the PARCC Algebra 1 test for many reasons. First of all, I do not feel teachers are educated enough about the way that PARCC interprets and tests the Common Core State Standards to be able to prepare their students for this test. This is through no fault of their own. There have been two administrations of the test, but only one administration of the test in its current form. There are also only a limited number of released questions to give teachers an idea of what the questions look like. You can not expect a teacher to prepare students for testing when they don't know what the end goal looks like. Good teaching alone will not help a teacher prepare for this test since it is such a shift in the way math has traditionally been tested. Currently we do not have textbooks that align with the CCSS and I'm not sure they even exist at this point.</p> <p>Secondly, our district has chosen to use the PARCC computerized version of the test. Our students do not have daily access to technology in math class to get practice using the tools that they need to use on the testing platform. They do not test this way in their math class so the PARCC test becomes something different and unfamiliar. A simple tutorial on the PARCC website is not enough for our students to develop the habits of mind they need to test on the computer. Research also shows that students who test on the computer get lower scores than students who test paper pencil versions. This brings into question the validity of the test itself. (See http://www.edweek.org/ew/articles/2016/02/03/parcc-scores-lower-on-computer.html.)</p>

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I agree with having high standards for our students and teachers. I would love to see ALL our students all be college ready. Realistically, not all students will go to college. We seem to forget that we are also preparing students to be career ready as well. Career ready is not necessarily the top two categories for PARCC

I also have to ask, "Is it even possible to get a scaled score of 725 or 733?" If so, what does that mean? Does it mean getting one more question right? The scaled score is a mystery. How do I tell a student how to improve their score to meet a passing rate? Do the law makers requiring this increase in scores know how the test is scored? I am willing to admit that I don't know where this score comes from. How can I make it better? So far, teachers have been provided with no useful feedback on how to improve their student test scores or what they can do better to help their students pass. I hope this feedback will one day be provided, but right now it is NOT.

In conclusion, I believe this raising the scores required for graduation on the PARCC Algebra I were chosen arbitrarily without thought about what this actually would mean for students, teachers, and school systems. Perhaps the bar can be raised eventually, but I believe that there are just too many unknowns and we are too early in the adoption of CCSS to be raising the bar already. I would prefer we know more about the test and how to interpret the CCSS before making decisions like this one. We don't have textbooks that reflect CCSS. We don't have technology to make testing on the computer a regular occurrence. We don't have a full understanding of the PARCC test questions and scoring. It is not time to raise the score for students and make this high stakes measure even more difficult to attain.

6. Lauren McElhenny
Special Education Teacher
Kent County High School
410-778-4540

I am writing in response to the proposed changes to 13A State Board of Education, 03 General Instructional Programs, 02 Graduation Requirements for Public High Schools in Maryland. I am a special education teacher and the Special Education Department Chair at Kent County High School in Kent County, Maryland. I recently learned about the proposed changes, which would include raising the passing score on the PARCC exam from a 3 to a 4 (or 725 to 750). The proposed change currently says that it would not have any impact on Individuals with Disabilities. However, this change would

		<p>impact the accessibility of this test for those individuals.</p> <p>The rigor of our curriculum, graduation requirements, and state testing has already increased over the last few years. Making the transition from the HSA (and Mod-HSA) to PARCC in English and Algebra has made an impact on students' ability to pass and graduate. With the HSA and bridge projects, our special education students were the ones in the building who had to take the test over and over again and do packets of extra work in order to graduate. Now, with the proposed changes, it will once again be our students who have to do the extra work in order to graduate.</p> <p>Our students during the 2015-16 school year took the PARCC tests in Alg I and English 10. In Algebra I we had 19 students with special education services test. 37% of them passed with a 3 or 4 (7 students total). However, only 11% passed with a 4 (2 students total). We had no student earn a 5. In English 10 we had 12 students with special education services test. 41% of them passed with a 3 or a 4 (5 students). However, only 8% passed with a 4 (1 student). We had no student earn a 5.</p> <p>I believe that adding to the passing level of state mandated testing will make it more difficult for our special education students to earn the credits and pass the tests that they must in order to graduate.</p>
<p>7.</p>	<p>Shari Aigner</p> <p>Crisfield High School & Academy 210 North Somerset Avenue Crisfield, Maryland 21817 Phone: 410-968-0150 Fax: 410-968-1178 saigner@somerset.k12.md.us</p>	<p>With all due respect, I would like to start off by saying that I am very proud to be part of an educational system that is progressive and cares so deeply about raising expectations for Mathematics students. I firmly believe that the decision to adopt Common Core Curriculum by the state of Maryland is commendable. I am delighted to teach such challenging curriculum, and I believe that my students are benefitting from the changes.</p> <p>Having said that, I am also very concerned about discussions concerning raising the cut off score from a level 3 to a level 4. I teach a broad spectrum of students from a variety of backgrounds and ability levels. With 20 years of teaching experience in both Special Education and Mathematics I speak from my heart with thoughtful consideration for all of my students. The PARCC assessment already has an increased difficulty level from previous state tests. Acquiring a score of level 3 for some students can be very difficult, but at least it is possible for them. I personally believe that the use of a bridge projects should be a last resort and only available to a very few students. I will have many students that</p>

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		<p>will always score in the 4 or 5 range, and there will always be those who do not. We have already seen what happens when enough students do not pass the test. There will then be newly devised ways to get as many students through as possible. Leaving the cut-off score at a reasonable level will prevent the necessity of newly concocted paths to graduation, and ease the high stress levels of students, parents, teachers, administrators. I pray that all will consider the affects of raising the cut off score to a level 4. I do not believe that is will prepare our students any better for post secondary outcomes and may have a detrimental affect and serious consequences. Thank you for your thoughtful consideration to this matter.</p>
<p>8.</p>	<p>F.M. McCullin West Middle Carroll County Public Schools</p>	<p>No sliding scale.... Pick a score and stick with it.... Why does one class get to score lower and still qualify for the same high school diploma ??... I teach CC alg 1... your decisions directly impact me and my students.... Let's get it right the first time</p>
<p>9.</p>	<p>Judy Gehr Coordinator of Curriculum and Instructional Resources Secondary Mathematics <u>Carroll County Public Schools</u> 410-386-1690 (voice) 410-751-3159 (fax) jagehr@carrollk12.org</p>	<p>I would like to propose that the passing score for PARCC Algebra 1 be 3, 4, and 5 for all students. This would allow our most struggling learners the opportunity to pass this assessment. I worry that the struggling students would not ever have a chance to pass if the score rises to only a 4 or 5.</p>
<p>10.</p>	<p>Mary E. Swack Supervisor of Secondary Mathematics <u>Carroll County Public Schools</u> 410-751-3066 (voice) 410-751-3159 (fax) meswack@carrollk12.org</p>	<p>Thank you for the opportunity to provide feedback on the passing scores of the Alg I PARCC. I fully support a passing score of 725 (Proficiency level 3) and for the score to remain a 3 in subsequent years. Alg I is the gateway to higher level math courses in high school. With the rigor of MdCCR, achieving a 725 is a much more difficult accomplishment than it was to pass the previous Algebra HSA. With the score remaining at 725, more students will be able to pass the assessment and feel capable and confident in taking higher level math courses. Our goal is to increase the number of higher level math courses students participate in, and this will be more likely if students aren't having to rely on a Bridge project to meet this graduation requirement.</p>
<p>11.</p>	<p>Sharon Laarz <i>Mathematics Teacher</i></p>	<p>Please keep the passing score for Algebra 1 at 725!</p>

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	North East High School	
12.	Stephanie Zang Eighth Grade Math Teacher Lead Mathematics Teacher Bohemia Manor Middle School	I strongly and sincerely think that the move from 725 as passing PARCC Algebra 1 to 750 is harmful to students for many reasons. I genuinely think that maintaining the passing score for PARCC Algebra 1 at 725 is beneficial for students and schools. It is the correct bar for a test that is a graduation requirement.
13.	Ashley Bradford Special Education Teacher abbradford@ccps.org 410-885-2095	I strongly and sincerely think that the move from 725 as passing to 750 is harmful to students for many reasons. I genuinely think that maintaining the passing score for PARCC Algebra 1 at 725 is beneficial for students and schools. I am passionate about mathematics and have high expectations for all students. Based on my intricate knowledge of the PARCC Algebra 1 test, the passing score of 725 is the correct bar for a test that is a graduation requirement.
14.	Dr. Virginia S. Newlin, NBCT Secondary Instruction & Local Accountability Coordinator Kent County Public Schools 5608 Boundary Avenue Rock Hall, MD 21661 410-778-6902 Fax: 410-778-2896	As the supervisor of secondary education and local accountability coordinator for Kent County Public Schools, I am extremely concerned, as are most of my colleagues, about the proposed changes to 13A State Board of Education, 03 General Instructional Programs, 02 Graduation Requirements for Public High Schools in Maryland. The proposed changes, which would include raising the passing score on the PARCC exam from a 3 to a 4 (or 725 to 750) will have an extremely deleterious effect on our high school and on our high school students. The rigor of our curriculum, graduation requirements, and state testing has already increased over the last few years. Even with the passing score set at a 3, making the transition from the HSA to PARCC in English and Algebra has had an impact on students' ability to be successful on the tests. The numbers of students who will have to complete bridge projects will rise exponentially and most of the burden will fall on our least able students, who will be required to complete bridges in multiple subjects. In addition, this will be a management nightmare for our staff. Our students took the PARCC tests in Alg I and English 10 during the 2015-16 school year. In Algebra I we had 19 students with special

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<p>education services test. 37% of them passed with a 3 or 4 (7 students total). However, only 11% passed with a 4 (2 students total). We had no student earn a 5. In English 10 we had 12 students with special education services test. 41% of them passed with a 3 or a 4 (5 students). However, only 8% passed with a 4 (1 student). We had no student earn a 5. These are only the numbers for students who have IEPs. There are many other students who have limited ability, but who are doing the best they can. These students will also bear the burden of large numbers of bridge projects.</p> <p>We are very much in favor of rigor. However, expectations must be realistic. We live in a rural area where many students follow their parents into farming or working on the water. While some of them will choose to earn a college degree along the way, continued formal education is not the right fit for everyone. Many of our students will go on to be successful plumbers, electricians, farmers, watermen, etc. Changing the passing level from 3 to 4 will not motivate these students to stay in school. They will see it as an unachievable goal. It seems obvious that if a percentage of students are unable to pass the current high school assessments, they will not be able to pass a far more rigorous test. It will most likely result in more students dropping out</p>	
<p>15. I strongly and sincerely think that the move from 725 as passing to 750 is harmful to students for many reasons. I genuinely think that maintaining the passing score for PARCC Algebra 1 and English 10 at 725 is beneficial for students and schools.</p> <p>At the LAC meeting on Tuesday, September 13, 2016 Doug Strader led a discussion of the priorities of what our next State Assessments should include. If we are indeed potentially moving away from PARCC to a new assessment for the 2018-2019 school year, there is even a more compelling reason to keep the "passing score" at the Performance Level 3 or better.</p>	<p>Bill Ide Instructional Coordinator for Assessment, Accountability and Title I Cecil County Public Schools 201 Booth Street Elkton, MD 21921 <u>410.996.5482</u></p>
<p>16. I am the Science Core Lead Teacher at Calvert High in Calvert County Maryland. I have been teaching 31 years and held the position of Science Core Lead since it's inception in the county 11 years ago. As our school</p>	<p>Suzanne Kistler Science Core Lead Calvert High School</p>

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<p>410-535-7330</p>	<p>and system are moving forward with the implementation of NGSS and preparing our curriculum to match the tested content of the MISA, we are finding limited hours in the day to work to make the necessary changes in our curricula, lessons and assessments. While we are trying to make all of the necessary changes an make time to reflect on the results of our changes, we are still needing to make sure our current students are graduation ready. I feel that at this point in time our time and energy would be better used preparing for the future plan for Maryland requirements in science than working one on one with the few remaining students who need to complete bridge work in biology. I think any student who passes their biology course and takes (or has taken) their Biology HSA should meet their graduation requirement in science. These students will receive the benefit of taking NGSS science courses in the following years in school rather than remediating in biology and completing biology bridge plans.</p>
<p>17. Alice Smith AMSMIT3@carrollk12.org</p>	<p>This is comments for the Graduation Requirements proposal 13A.03.02:</p> <p>I would recommend one passing score and not 4 different scores due to the fact that the multiple passing scores makes this difficult for students and parents. The expectations to graduate for the same assessment should be the same for all students.</p> <p>I also would recommend the passing score be at level 3, 725. This should be the minimum level of expectations for students to graduate. Students receive high school credit for a course for the minimum level of expectations (grade D). It is clarified for Maryland graduation requirements that to meet the University of Maryland students must have a C or better. The new CCR requirements also have standards to show college and career readiness. The state of Maryland already has minimum expectations based on credits required. This should be the same for graduation assessment requirements and the score should be minimum expectations, level 3 725.</p> <p>Lastly, we need an expectation for the 2017-2018 school year since the MISA assessment is going to be piloted. I understand that each year the State Board will review although the knowledge that the assessment is</p>

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<p>being given next year is known now. The local county, students, and parents need to know the requirements now and not be required to wait until late Fall/early Winter as they are for this school year.</p> <p>Clarification needs to be provided for students that pass the English 10 or Algebra I course connected to the assessment although do not assess during that school year. For example, a student receives credit for Algebra I in 2015-2016 although did not assess for medical reasons or other reasons. Are they required to participate or pass? According to the proposal, to meet the requirement by participation it states they must assess during that specific school year (Biology 2016-2017 and Algebra I/English prior to 2016-2017. I want to ensure the intent of this proposal is that students who missed assessing for a variety of reasons although received credit during the 2015-2016 school year are now required to pass the assessment. This would be the same for the achieving passing score that it deals with when the student assesses and not when the student takes the course or passes the course.</p>		
<p>The comments below are from the Howard County Public School System.</p> <p>For the proposed COMAR changes in 13A.03.02, the Howard County Public School system submits the following comments.</p> <p>In .09 Diplomas and Certificates B.(3)(a), the incremental increase from a performance level 3 to a level 4 over a four year period presents the following challenges.</p> <ol style="list-style-type: none">1. Explaining which passing score is required to parents, students and schools becomes challenging. This will result in incorrect retesting of students and unnecessary bridge plan work.2. Combined score options may not be available due to the complicated combinations of scores. Eliminating the combined score options increases the number of bridge plans required and does not provide students the flexibility that was previously in place.3. The coding of the requirements places a burden on local districts and has cost implications for data systems that can not	<p>18. Tim Guy Coordinator of Assessment Department of Accountability and Continuous Improvement Howard County Public School System Phone: 410-313-6802 Cell: <u>443-994-8927</u> Fax: <u>410-313-1534</u></p>	

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accommodate the fluctuating requirements.

The HCPSS understands the desire for the higher standards, but would propose that level 3 (725) be set as the requirement and that the state board revisits the requirement after the 4 year period. At that time, the state board could consider moving to the level 4 requirement. This method would reduce school level confusion and provide the state board with time to analyze student performance increases. HCPSS recommends that the MSDE report out the percentage of 3+ and 4+ on mdreportcard.org. HCPSS does not recommend changing targets annually.

The new language in .09 Diplomas and Certificates C.(2)(2) (*For all students taking the HSA biology assessment in the 2016–2017 school year, taking the HSA biology assessment will meet the graduation assessment requirement for biology.*), indicates that students would need to participate during the 2016-2017 school year. The HCPSS proposes the following language to alleviate retesting of students that have previous scores:

For students taking a Biology course for the first time in the 2016–2017 school year or who have taken the course prior to the 2016-2017 school year, taking or having a previous score for the HSA biology assessment will meet the graduation assessment requirement for biology.

Students who are currently in the process of preparing for reassessment in Biology or working on bridge plans would automatically meet the requirements without needing to participate in the retake of the Biology HSA.

Thank you for your consideration of our comments and considering the needs of all students.

19. Casie Reynolds

I am against the idea of increasing the passing PARCC Algebra score

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<p>over the next 5 years. Many teachers are still becoming familiar with the curriculum, resources and software programs that accompany resources. I agree with setting high standards, these should be progressed more slowly e.g. 725 2017-2018, 733 2019-2020, 741 2020-2021, 750 2020-2021.</p> <p>Increasing these scores over a longer time frame will ensure you are measuring student success and not teacher accountability.</p> <p>I have been a superintendent for 28 years in WV, DE and MD. Following are my observations on graduation requirements.</p> <p>I believe Maryland should take a step back and reconsider the requirement of a cut score on any test as a graduation requirement.</p> <p>We will be determining College and Career Ready measures. I would suggest it should be college <u>or</u> career ready. We are listing a number of options for a student to be considered college ready. If it is possible for a student to be considered college ready by one of those measures yet they don't make a certain score on PARCC, what does that say about the value of the diploma?</p> <p>I would argue that any student who hits the mark on any of the lists of possible exams for College Ready meets therefore the graduation requirement.</p> <p>I would argue that Career Ready not be the same as college ready. That it not be dependent upon a specific academic score, but be dependent upon other measures unique to the career of choice. Career ready includes many high level skills in specialized uses of math and technical reading that are different that college readiness. There are plenty of students who gain certification in welding or who pass the state test for cosmetology or otherwise demonstrate readiness for a specific career and can jump right into work with it. They are career ready and that is the path they've chosen. I am not convinced that each and every high school graduate needs the same level of skill in math and reading as one projected to be successful in college.</p>	<p>Calvert High School Mathematics Core Lead</p>	
<p>20.</p>	<p>Daniel D. Curry, Ed.D. curryd@calvertcounty.education 410-535-7804 @calvertsuper http://calvertschoolssuperintendent.blogspot.com</p>	

		<p>Finally, a thought about some of our students with IEPs who are on the diploma track. Some students with IEPs are indeed headed to college and do well. But, the state should study these students who have had to take the HSA or PARCC twice then have to do a Bridge Project and ask if it was in the best interest of that student. I have students in this group who need double English and double math time on their schedule in order to meet the testing requirements for graduation and as a result, don't have time to schedule career/technical training which would serve them better. They graduate with a diploma, but they are not college or career ready and they have not been well served by the system.</p>
<p>21.</p>	<p>Jami Straub Mathematics Core Lead Northern High School</p>	<p>I am writing in response to the public comment session for the PARCC Algebra 1 test. My first comment concerns having the test be a requirement for this school. As a High School Math teacher, and a parent of a student in the public schools, I am concerned with the fact that students in Maryland have only been taking the test since the Spring 2015 and that the test given in Spring 2015 and Spring 2016 had major differences in how it was administered. The number of questions and timing of the test has been different each year. For students to be expected to meet a requirement for a test that is still evolving is unrealistic and unfair to these students. The new exam is so different from the types of tests most of these students have taken before. Many of these students are ones who were taught all through elementary school the concepts and skills needed to pass MSA, which is a drastically different format of test. These students who are taking the test this year were taught under two very different models of learning - Maryland State Standards and now College and Career Readiness Standards. The PARCC website states, "Students are required to explain their answers, and defend their reasoning, which is different from previous tests. A student who was performing well on the previous test might not do as well on the new PARCC test." We need to slow down and give these students ample opportunities to fill in their learning gaps before we begin requiring a test for graduation. When we required HSA to be the test they needed to graduate we allowed more time to phase in the test to ensure it was measuring what it was intended to measure and we gave school systems and teachers an ample amount of time to adjust their instruction and</p>

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acing to meet the new standards. Even according to the PARCC website, "the tests are new and they ask questions in different ways, and require students to show their work. As happens with every new test, scores will start to improve as teachers and students become more familiar with the standards and acquire the skills and knowledge to meet them." We should give our students and teachers at least 3-4 more years to become more familiar with the test. The amount of reading required on PARCC Algebra is intense and many of our students still struggle with reading. Many educational experts have stated, "The PARCC tests are often not developmentally appropriate and test skills that are not acquired by students until much later." In addition at this time only one other state is requiring students to pass PARCC as a graduation requirement, New Jersey, but they also have other options for those students (<http://www.state.nj.us/education/assessment/parents/GradReq.pdf>) The fact the PARCC consortium is down from 26 states to 6 and the District of Columbia, and only one of those states is requiring it to make diploma decisions, should be indicator enough that perhaps we should wait and give the test a few more years of practice before making it a requirement. We would not be the only state doing so, In Illinois, state educators have opted to replace the PARCC exams with the SAT and will provide it to all public high school juniors to reduce testing "redundancy and maximize the value of test-taking time," the state said. Neither test is used as a graduation requirement. Colorado's graduation requirements for the Class of 2021 offer a menu of test options; PARCC is not mentioned by name among them. Massachusetts, which administers the PARCC, requires passing scores on its own state assessment tests but still offers options for proving graduation readiness. In New Mexico, students have to have taken the PARCC twice but the state offers a menu of options to meeting assessment graduation requirements, while in Rhode Island, graduation requirements include testing but do not mention PARCC. Some states have dropped standardized testing altogether as a graduation requirement. California recently rescinded its requirement for high school students to pass a standardized test after more than a decade of court battles and debate, according to the San Jose Mercury News. Pennsylvania shelved any decision on utilizing tests as graduation

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requirements until 2019.

According to the PARCC consortium website nowhere does it say that the PARCC ELA 10 and PARCC Algebra I tests were designed to measure whether students have achieved minimum basic skills all students must possess to function politically, economically, and socially in a democratic society. Instead, PARCC is focused on assessing college and career readiness -- a laudable goal, but a much higher standard than the minimal basic skills standard the Board is authorized to employ in approving a test to determine which public school students in the state will be denied high school diplomas.

My second comment concerns the passing score for the requirement when it is put into effect. A score of 3, 4 or 5 should be the requirement for the State of Maryland for students to meet the requirement for graduation. We keep missing the idea that students are to also be career ready not just college ready. If they score a 3 on PARCC, they are approaching expectations, which indicates that they are approaching proficiency in Algebra 1. Not all the skills in Algebra 1 are necessary for a student to be career ready. Proponents of PARCC say the test is a better measure of college readiness and critical thinking skills and that too many students have graduated needing remedial classes before they can start college. However, there are many careers that do not require a college degree. A student who scores a three is showing they are approaching this understanding and since Algebra 1 is typically a freshman or sophomore class they are not yet ready to be put into a career or college and are still approaching their high school graduation. They have two to three more years of math, and with the new requirement that all students take four years of math students who are approaching expectations in early high school will most likely meet those expectations upon graduation. According to PARCC, " There are five performance levels, with the top two indicating a strong grasp of grade level standards and readiness for the next step in a student's educational development. "Do all students need to have a strong grasp of the content to show an understanding of the skills required?" From PARCC parent guide, "Approached Expectations," means that the student's subclaim performance reflects a level of proficiency consistent with Performance Level 3. Students in this subclaim category likely need academic support

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<p>to engage successfully in further studies in the subclaim content area. Compare this to, "Did Not Yet Meet" or "Partially Met Expectations," meaning that the student's subclaim performance reflects a level of proficiency consistent with Performance Level 1 or 2. Students in this subclaim category are likely not academically well prepared to engage successfully in further studies in the subclaim content area. Such students likely need instructional interventions to increase achievement in the subclaim content area. There seems to be large gap between a two and a three. Students who score a one or two are clearly not ready for the next course in sequence and will need major support in the next class. While a student who scores a three needs some academic support but is able to move to the next course in sequence. Eventually many years down the road the hope will be that most students are scoring a 4 and 5, but to require that even in the next five years is unfair to the students, parents and teachers who are still dealing with the challenges and struggles of the curriculum and tests.</p> <p>In summary, the PARCC Algebra test should not be a requirement for this year, and the next few years. When it does become a requirement then a score of 725 or higher (performance level of 3 or higher) should be the required score to meet the state graduation requirement.</p>	
<p>With respect, I disagree that the 4-year model of staggered increase where Algebra 1 cut scores are raised represents a realistic goal and disagree that graduation standards for the Algebra 1 assessment must be equivalent to that of CCR designation obtained from the Algebra 2 assessment.</p> <p>It was originally stated that a score of "approaching expectations" on the PARCC Algebra 1 assessment correlates to the former passing HSA Algebra/Data Analysis score requirement. My opinion is that expectation for achievement should not change. This test is considerably more rigorous. Questions branch well-beyond multiple choice and content has shifted. While holding students to rigorous standards of performance is the mission of every school system, tying high school graduation to such a high level of achievement on a single measure does not serve the best interest of all students.</p>	<p>22. Andrew Todd Secondary Mathematics Supervisor Wicomico County Public Schools <u>410-677-4528</u> (office) <u>410-677-4406</u> (fax)</p>
<p>23. Devin Hall</p>	<p>I am writing in response to the public comment session for the PARCC</p>

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Northern High Algebra I Math Teacher

Algebra I test. My first comment concerns having the test be a requirement for this school. As a High School Math teacher of Algebra I, I am concerned with the fact that students in Maryland have only been taking the test since the Spring 2015 and that the test given in Spring 2015 and Spring 2016 had major differences in how it was administered. The number of questions and timing of the test has been different each year. For students to be expected to meet a requirement for a test that is still evolving is unrealistic and unfair to these students. The new exam is so different from the types of tests most of these students have taken before. Many of these students are ones who were taught all through elementary school the concepts and skills needed to pass MSA, which is a drastically different format of test. These students who are taking the test this year were taught under two very different models of learning - Maryland State Standards and now College and Career Readiness Standards. The PARCC website states, "Students are required to explain their answers, and defend their reasoning, which is different from previous tests. A student who was performing well on the previous test might not do as well on the new PARCC test." We need to slow down and give these students ample opportunities to fill in their learning gaps before we begin requiring a test for graduation. When we required HSA to be the test they needed to graduate we allowed more time to phase in the test to ensure it was measuring what it was intended to measure and we gave school systems and teachers an ample amount of time to adjust their instruction and pacing to meet the new standards. Even according to the PARCC website, "the tests are new and they ask questions in different ways, and require students to show their work. As happens with every new test, scores will start to improve as teachers and students become more familiar with the standards and acquire the skills and knowledge to meet them." We should give our students and teachers at least 3-4 more years to become more familiar with the test. The amount of reading required on PARCC Algebra is intense and many of our students still struggle with reading. Many educational experts have stated, "The PARCC tests are often not developmentally appropriate and test skills that are not acquired by students until much later." In addition at this time only one other state is requiring students to pass PARCC as a graduation requirement, New Jersey, but they also have other options for those

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students

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The fact the PARCC consortium is down from 26 states to 6 and the District of Columbia, and only one of those states is requiring it to make diploma decisions, should be indicator enough that perhaps we should wait and give the test a few more years of practice before making it a requirement. We would not be the only state doing so.

In Illinois, state educators have opted to replace the PARCC exams with the SAT and will provide it to all public high school juniors to reduce testing "redundancy and maximize the value of test-taking time," the state said. Neither test is used as a graduation requirement. Colorado's graduation requirements for the Class of 2021 offer a menu of test options; PARCC is not mentioned by name among them. Massachusetts, which administers the PARCC, requires passing scores on its own state assessment tests but still offers options for proving graduation readiness. In New Mexico, students have to have taken the PARCC twice but the state offers a menu of options to meeting assessment graduation requirements, while in Rhode Island, graduation requirements include testing but do not mention PARCC.

Some states have dropped standardized testing altogether as a graduation requirement. California recently rescinded its requirement for high school students to pass a standardized test after more than a decade of court battles and debate, according to the San Jose Mercury News.

Pennsylvania shelved any decision on utilizing tests as graduation requirements until 2019.

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My second comment concerns the passing score for the requirement when it is put into effect. A score of 3, 4 or 5 should be the requirement for the State of Maryland for students to meet the requirement for graduation. We keep missing the idea that students are to also be career ready not just college ready. If they score a 3 on PARCC, they are approaching expectations, which indicates that they are approaching proficiency in Algebra 1. Not all the skills in Algebra 1 are necessary for a student to be career ready. Proponents of PARCC say the test is a better measure of college readiness and critical thinking skills and that too many students have graduated needing remedial classes before they can start college. However, there are many careers that do not require a college degree. A student who scores a three is showing they are approaching this understanding and since Algebra 1 is typically a freshman or sophomore class they are not yet ready to be put into a career or college and are still approaching their high school graduation. They have two to three more years of math, and with the new requirement that all students take four years of math students who are approaching expectations in early high school will most likely meet those expectations upon graduation. According to PARCC, "There are five performance levels, with the top two indicating a strong grasp of grade level standards and readiness for the next step in a student's educational development." Do all students need to have a strong grasp of the content to show an understanding of the skills required?" From PARCC parent guide, "Approached Expectations," means that the student's sub claim performance reflects a level of proficiency consistent with Performance Level 3. Students in this sub claim category likely need academic support to engage successfully in further studies in the sub claim content area. Compare this to, "Did Not Yet Meet" or "Partially Met Expectations," meaning that the student's sub claim performance reflects a level of proficiency consistent with Performance Level 1 or 2. Students in this sub claim category are likely not academically well prepared to engage successfully in further studies in the sub claim content area. Such students likely need instructional interventions to increase achievement in the sub claim content area. There

		<p>seems to be large gap between a two and a three. Students who score a one or two are clearly not ready for the next course in sequence and will need major support in the next class. While a student who scores a three needs some academic support but is able to move to the next course in sequence. Eventually many years down the road the hope will be that most students are scoring a 4 and 5, but to require that even in the next five years is unfair to the students, parents and teachers who are still dealing with the challenges and struggles of the curriculum and tests.</p> <p>This is my third year teaching Algebra 1 under the new college and career ready standards, and it is the third curriculum that I have had to use. There needs to be consistency with what the delivery of instruction before they should be required to earn a score of 3, 4, or 5 to earn a graduation requirement. Let the gaps be filled first!</p>
<p>24</p>	<p>Mary R. Dagen "Dagen, Mary R." <mdagen@bcps.org></p>	<p>Section .09 Diplomas and Certificates should be revised to reflect an establish passing score based on a standard.</p> <p>Incremental increases depending the year/cohort a student is enrolled are arbitrary and not equitable. The rules changing from year to year based on our capacity to implement an assessment that is valid and reliable is not a measure of student readiness for graduation.</p>
<p>25</p>	<p>Lisa S. Mandell Educational Services Coordinator Baltimore Lab School 2220 Saint Paul Street Baltimore, MD 21218 (410) 261-5500 main (410) <u>735-0026</u> direct</p>	<p>As an educator at a Non-Public special education school, I encourage the Board to adopt the proposed regulation that states, "For students who are graduating in school years 2016—2017 and 2017—2018 and who are first-time test takers of Algebra I and/or English 10 in those school years, if a student has taken an [HSA-aligned or PARCC-aligned] Algebra I and/or English 10 course and has passed the course(s) but failed the [assessment] Maryland High School Assessment aligned with [the] those course(s), that student is exempt from completing a Bridge Plan for Academic Validation and will have met the assessment requirement for Algebra I and/or English 10." (Maryland State Government, 2016)</p> <p>Additionally, I encourage the Board to adopt the Exception to the Passing</p>

<p>Score Requirement for the Biology HSA which states. "For all students taking the HSA biology assessment in the 2016—2017 school year, taking the HSA biology assessment will meet the graduation assessment requirement for biology." (Maryland State Government, 2016)</p> <p>As an educator at a Non-Public special education school, I encourage the Board to adopt the proposed regulation that states, "For students who are graduating in school years 2016—2017 and 2017—2018 and who are first-time test takers of Algebra I and/or English 10 in those school years, if a student has taken an [HSA-aligned or PARCC-aligned] Algebra I and/or English 10 course and has passed the course(s) but failed the [assessment] Maryland High School Assessment aligned with [the] those course(s), that student is exempt from completing a Bridge Plan for Academic Validation and will have met the assessment requirement for Algebra I and/or English 10." (Maryland State Government, 2016)</p> <p>Additionally, I encourage the Board to adopt the Exception to the Passing Score Requirement for the Biology HSA which states. "For all students taking the HSA biology assessment in the 2016—2017 school year, taking the HSA biology assessment will meet the graduation assessment requirement for biology." (Maryland State Government, 2016)</p> <p>Maryland State Government. (2016). <i>Maryland register</i> (DSD Publication Volume 43, Issue 18). Annapolis, MD: U.S. Office of the Secretary of State.</p>	<p>Joseph F. DiBello Director of College & Career Counseling, Registrar Baltimore Lab School 2220 St. Paul Street Baltimore, MD 21218 410-735-0028</p>
<p>26</p>	<p>Anne M. Gellrich Executive Director of High School Education Cecil County Public Schools 410-996-5455 agellrich@cccps.org</p>
<p>I am writing to comment on the proposed Graduation Requirements. I have several concerns:</p> <p>First, the incremental increase in the passing score for Algebra I and English requires an enormous leap of capacity for maintaining data. Students in the same graduating class may take the Algebra I test in three different years. Maintaining records and recalling three different student score requirements for the same group of students is bound to lead to mistakes on the part of school counselors and/or administrators who are charged with ensuring students meet graduation requirements. Increasing test score requirements by graduation year instead of the year a student</p>	<p>27</p>

takes the test will reduce the chance of error.

Second, the rate of increase in the passing score is concerning. The scores required for graduation will lead to a large number of students needing Bridge Plans. The implications for staffing, scheduling, and opportunities for students are significant. I would suggest that the score increase at smaller increments with a starting point where 60% of our students would pass.

While we can all support high standards, we must keep in mind that the standards have been raised significantly, and students and teachers need support to meet those standards.

Third, with the large number of Bridge Plans that will be required, the process for completing and grading them must be clear and streamlined, and the actual plans must be available at least two years prior to the students graduating. The training and scheduling required to support students who are doing Bridge Plans is extensive and cannot be left out of the time frame for release.

Fourth, students with IEP's and English Learners need to be considered in these targets. I suggest that we carefully study their success rate and keep in mind that their frustration with academics often impacts their decisions to come to school, perform in class, and graduate.

Finally, many of the PARCC supports promised by MSDE for teachers and administrators are not completed or haphazardly implemented. The need for curricular support, especially for smaller counties where staff is limited, is great.

The graduation requirements must be attainable for the majority of our students, easily implemented at the school level, and supported by clear and timely information from MSDE.

Please feel free to contact me if you have further questions.

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Educational Services Coordinator
Baltimore Lab School
2220 Saint Paul Street
Baltimore, MD 21218
[410-735-0041](tel:410-735-0041)

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Maryland State Government. (2016). *Maryland register* (DSD Publication Volume 43, Issue 18).

Annapolis, MD: U.S. Office of the Secretary of State.

29 renard@gmail.com

Please find below my comments on the proposed changes to this section of COMAR.

The proposed regulation states students may participate in Bridge after 1 failure and shall be provided at least one more opportunity. Too vague. The current regulations around the bridge plan requires 2 failures. To be consistent with current regulation in a previous section, the regulation should include they must be provided another opportunity and after the second failure, a successful bridge plan could be used as a substitute.

.06F2 mentions a combined score option. The combined score option has been of great benefit to a lot of students.

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	<p>This needs to remain in the regulation.</p> <p>.09B.a addresses the ramping up every year of the passing score for the next 4 years. In a memo to the State Board dated February 23, 2016, interim State Superintendent Jack Smith shared results of analyses between PARCC Eng 10 and Algebra 1 and HSA English and Algebra. Those analyses showed that the corresponding PARCC performance level for a passing HSA score was a performance level 2. The respective PARCC scale scores were 720 for Algebra and 707 for English. Given this information, beginning the passing PARCC score at 725 (performance level 3) and increasing it each year over four years to 750 (performance level four) seems unfair to students and unreasonable within the timeframe. Set the passing PARCC score at 725 and leave it there.</p> <p>.09B.3a There is no mention of a combined score option to meet requirements here or in .09C. However, .06 does allow for CSO. This is inconsistent and should be addressed.</p> <p>.09C.2 This is unclear. Does this allow for all students who have taken Biology prior to 2016-17 regardless of passing status. If so, this would have a huge impact on the number of bridge plans that are submitted. This section also does not address the continuation of bridge plans for Government.</p>
<p>30</p>	<p>Lindsey McCormick Local Accountability Coordinator Caroline County Public Schools</p> <p>As LAC, I firmly believe that rolling passing scores for Algebra I and English 10 would be unmanageable for schools and for data collection.</p> <p>I also have questions if Biology assessment becomes participation only</p>

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<p>204 Franklin Street Denton, MD 21629 410-479-1460</p>	<p>for this year-</p> <ol style="list-style-type: none">1. Would students still be able to combine Gov't and Bio scores. If not several students would potentially need to Bridge in Government and had already been deemed "met" by schools?2. if students have already taken and failed bio but retake assessment in 2016-2017 school year would they meet the requirement regardless of the score (.09 C2)
<p>31</p> <p>Maureen C. Margevich Supervisor of Testing and Accountability, Local Accountability Coordinator (LAC) Building a Community that Inspires Curiosity, Creativity, and Achievement. 301.766.2847 (office) 301.730.9583 (mobile) 301.766.8830 (fax) wcpemd.com marylandassessments.org Washington County Public Schools 10435 Downsville Pike, Hagerstown, MD 21740</p>	<p>I would like to provide my feedback on the proposed change to that graduation requirements for PARCC. In section .09.B.3.a, the proposed change is "For the school year 2016-2017, a score of 725 :". With the delays in implementation of the proposed change in regulation, I feel that LEAs will have difficulty providing adequate communication to schools, students, parents, and stakeholders regarding this change before students are assessed during the fall block administration of PARCC. Even if the law passes in late October, the testing window opens in mid- to late-November (depending on the format) and I feel that this is too short of a timeline to provide notice to students who will need this assessment in order to graduate.</p>
<p>32</p> <p>Deborah Gilmartin Supervisor of State Assessment & Accountability Frederick County Public Schools 191 South East Street Frederick, MD 21701 301-696-6919 Office 301-696-6956 Fax</p>	<p>The FCPS System Accountability and School Improvement leadership would like to make public comment on the proposed changes to the "Graduation Requirements for Public High Schools in Maryland," 13A.03.02.</p> <p>We would like to recommend that the Maryland State Board of Education set graduation cut scores at 725 for Algebra I and English 10. We further recommend that the cut score not be raised to 750 until the 2020 school year or until students have had continuous access to the Maryland Common Core State Standards from K through 12th grade. Finally, we recommend that cut scores are not implemented using an incremental approach to the 750 cut score.</p> <p>We base our recommendations on the following arguments:</p> <ol style="list-style-type: none">1. We believe holding the cut scores at 725 for four years will allow

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time for necessary research regarding the impact of setting such a high standard and whether that standard is achievable.

2. We believe that graduation cut scores should not be set prior to the setting of cut scores used for state accountability. The state's current ESSA work group has not yet made recommendations for that cut score, and that final cut score could be in contrast to the graduation cut scores.
3. The provision for using an incremental approach to the 750 cut score will create an extreme burden to state and local data teams and school base counselors who must monitor student pass rates. This approach (and moving away from the previous cohort model) is tremendously hard to communicate to students, parents, staff, and community.
4. The increased rigor and expectations of setting cut scores at 750 will result in a large portion of students unable to earn a diploma. Frederick County typically performs in the top quartile of scores across the state. If using the PARCC proficiency levels of 4 or 5, only 51% of FCPS students will meet cut scores for Algebra I, and only 56% of students will meet the cut scores for English 10. Assuming our math scores increase by 30 percentage points over the next five years (the historical 5 year state increase for HSA) to 81%, and our English scores increase by 11 percentage points (the historical 5 year state increase for HSA) to 67%, a large majority of our students will not meet graduation standards without using a combined score or bridge option. With cut scores set so high, the combined score option will not likely be an option for most students for these two exams. In addition, multiple opportunities to retest students have been eliminated and 20% to 33% of our students will be forced into the bridge program. This possibility has major instructional and

<p>accountability implications.</p> <p>5. We believe that the high expectations of proficiency levels of 4 and 5 are more closely aligned with the College and Career Readiness expectations (defined as prepared for college level credit-bearing coursework). We feel that the Board could keep the graduation cut score at 725 for Algebra and English 10, and add a CCR designation if a student meets the CCR requirements already in place. Requiring levels 4 and 5 for performance (achievement accountability) and levels 4 and 5 for CCR requirements (CCR accountability) is double jeopardy for high school accountability.</p> <p>6. Our data demonstrates we have students who have earned CCR designation (per CCR Act) using dual enrollment, Accuplacer, or other measures, but would not meet the assessment graduation requirements if the cut score is set at 750. This would be a contradictory issue difficult for parents and families to understand. How can students be CCR ready, but not able to earn a diploma by meeting a cut score. Why would students who are CCR ready and taking dual enrollment courses need to participate in a Bridge Plan?</p> <p>Thank you for considering our comments. Respectfully,</p>		
<p>A high school diploma and CCR designation should not be equal. The emphasis for CCR has been college focused, not career focused. All students don't need to go to college in order to be successful, productive citizens. CCR should indicate a student can successfully enter college without needing remediation. A student with a high school diploma and no CCR designation could also go to college but may need to take some remedial courses. While demanding rigor and having high expectations should always be our mission, it should not be defined as narrowly as</p>	<p>ELLEN HARLAN <charlan@wcboe.org></p>	<p>33</p>

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academic college prep, which is the sole purpose of PARCC ELA 10. While there are multiple pathways to receive the CCR designation, there is only a single high stakes assessment to determine high school graduation. I am very concerned about the huge number of students that will not get a diploma if this four year plan is implemented. I am also concerned about the impact of bridge project work and scoring on both the financial and human resources in the district. The new transition course is already taxing our staff.

October 7, 2016



10435 Downsville Pike
Hagerstown, MD 21740
301-766-2800

Dr. Peggy Pugh
Associate Superintendent of Curriculum and Instruction

October 3, 2016

VIA EMAIL danielle.susskind@maryland.gov
Ms. Danielle Susskind, Lead Academic Policy Specialist
Division of Academic Policy and Innovation
Maryland State Department of Education
200 West Baltimore Street
Baltimore, Maryland 21201

RE: Proposed Changes to Code of Maryland Administrative Regulations 13A.03.02 – “Graduation Requirements for Public High Schools in Maryland”

Dear Ms. Susskind:

I serve as the associate superintendent for curriculum and instruction for Washington County Public Schools (WCPS). I have been requested to coordinate the submission of WCPS's comments on the above referenced subject.

Washington County Public Schools (WCPS) submits the following comments with respect to the proposed changes being offered to Code of Maryland Administrative Regulations (COMAR) 13A.03.02, entitled “Graduation Requirements for Public High Schools in Maryland.”

- COMAR 13A.03.02.09C(2)

Washington County Public Schools agrees strongly that due to the transition from Biology HSA to MISA that students who take the exam this year should meet the graduation requirement and not need to meet a passing score. WCPS would add that this graduation requirement should be extended for the 2017-18 and 2018-19 school years as students take a new assessment and continue the transition to new science curriculum.

- COMAR 13A.03.02.06F(2), 13A.03.0206G, and 13A.03.02.09C(1)

Washington County Public Schools agrees with the changes to these regulations. They all support students in meeting graduation requirements as students and the school system transition to the Algebra 1 and English 10 PARCC exams.

- COMAR 13A.03.02.09B(3)(a)

With regard to 13A.03.02.09B(3)(a), WCPS would support a passing score of a 3 (725).

Sincerely,

A handwritten signature in blue ink that reads "Peggy Pugh".

Peggy Pugh, Ed.D.

Montgomery County Public Schools-

COMAR - September 2016 - Proposed Changes

Questions/observations regarding the MHS graduation testing requirement

Proposed changes are in the [September 2, 2016 edition of the Maryland Register](#) on pages 1035 - 1036.

.06 D - Maryland High School Assessments: *“Each student who failed a Maryland High School Assessment *once may participate in the Bridge Plan for Academic Validation and shall be provided at least one opportunity to retake the appropriate assessment...*”*

- This statement indicates it is not necessary for a student to take a test a second time to be able to “participate” in the Bridge Plan program. Does “*may participate in the Bridge Plan for Academic Validation*” mean 1) complete Bridge Plan projects, 2) have them submitted and scored, and/or 3) earn Bridge Plan validation.
- This statement also says that the student must only be provided the opportunity to retake a test. Is the student required to retake the assessment prior to submission and scoring of Bridge Plan projects? Prior to meeting the assessment requirement via the Bridge Plan for Academic Validation? Is the student free to pass on or forego all retake opportunities and only pursue the Bridge Plan after failing?

.09 C (2) Biology: *“For all students taking the HSA biology assessment in the 2016 – 2017 school year, taking the HSA biology assessment will meet the graduation assessment requirement for biology.”*

- Are students who took and failed the Biology HSA prior to 2016-17 still required to retest and/or participate in the Bridge Plan in order to meet the Biology HSA requirement?

.09 B (3) (a) (i) - (iv) Proposed passing score increases over 4 years: Enacting this proposal will make it more difficult for districts to communicate clearly with parents about graduation testing requirements and also complicates the process of documenting and reporting student progress. Please see a proposed system below that minimizes mixed messages to parents as well as makes it easier on district data systems.

If MSDE/MSBOE set the PARCC passing score of 750 from the beginning, then the result proposed in COMAR could be achieved through the graduated use of “PARCC Transition Allowance Points” based on the first year the student took the

PARCC assessment. The passing score expectation of 750 would be unchanging and clear to all throughout the PARCC transition. Students who take the assessment for the first time in 2016-2017 (or earlier) would be allowed a PARCC Transition Allowance of 25 points to use, if needed, to meet the graduation assessment requirement. Since students usually take the Algebra 1 assessment one or two years before the English 10 assessment, allowing the PARCC Transition Allowance of 25 points for tests taken before 2016-2017 would permit students who took a PARCC assessment before 2016-2017 to use those allowance points in the PARCC combined score option. The chart below shows the graduated schedule of PARCC Transition Allowance Points that would achieve the result in the proposed COMAR changes.

Year When PARCC Assessment Was First Taken	PARCC Transition Allowance Points	PARCC Passing Score	PARCC Combined Score
2016-2017 (or earlier)	25	750	1500
2017-2018	17	750	1500
2018-2019	9	750	1500
2019-2020 (and beyond)	0	750	1500

The way this would work is illustrated below for three students who earned the same highest scores on the assessments, but who differ by when they first took the assessments.

223344	ALG01	2017-2018	17	730	Fail ¹	Not Met ³	¹ Student "score" is only 747 when Transition Allowance used ² Student "score" is only 729 when Transition Allowance used ³ Student "combined score" is (747 + 729=1476) when using both Transition Allowances
223344	ELA10	2018-2019	9	720	Fail ²		

What is shown has the same outcome as what is proposed in COMAR, but it is easier to program, report, and explain to parents and students.

For monitoring and reporting assessment statuses for each content, it would be possible to report student numbers and percentages for "Passed," "Passed using Transition Points," and "Failed." These statuses are most interpretable if reported by the First Year Assessment Taken. Thus, the progress of student cohorts toward meeting the passing score expectation (750) could be more easily monitored over time. The percentages of students who meet the passing score of 750 and of students who needed to use "PARCC Transition Allowance points" could be monitored each year.

For this to work well, LEAs may need support from MSDE to know when students transferring from other LEAs first took the PARCC Algebra 1 and PARCC English 10. From the "School Year First Taken," LEAs would have clear rules for the Transition Allowance Points for the assessment.

Combined Scores: Will there be combined scores for PARCC tests?

- The combined score option is identified as a means of meeting the MHS graduation requirement in [13A.03.06](#) and in [13A.03.02.09](#), but the particulars aren't delineated in COMAR, i.e., the 11 HSA combined scores that are currently available.
- In a [press release from April 27, 2016](#), MSDE proposed PARCC combined scores of 1450 (725+725), 1466 (733+733), 1482 (741+741), and 1500 (750+750), but these combinations are probably the least likely to occur (with the exception of 1466) since the majority of students do not take Algebra 1 and English 10 in the same year, and they wouldn't take the PARCC tests the same year. PARCC combined scores would

have to include all possible combinations of scores covering the 4 year span of incremental score increases, and these combined scores, along with the 11 HSA combined scores further complicate districts' efforts to track student progress and to communicate requirements to parents, students, and staff.

■ 1450 (725 + 725)	1482 (741 + 741)	1491 (741 + 750)
■ 1458 (725 + 733)	1474 (733 + 741)	1483 (733 + 750)
■ 1475 (725 + 750)	1500 (750 + 750)	1466 (725 + 741; 733 + 733)

.06 G First-time PARCC test-takers attempting to graduate: *“For students who are graduating in school years 2016-2017 and 2017-2018 and who are first-time test takers of Algebra 1 and/or English 10 in those school years, if a student has taken an Algebra 1 and/or English 10 course and has passed the course(s) but failed the Maryland High School Assessment aligned with those course(s), the student is exempt from completing a Bridge Plan for Academic Validation and will have met the assessment requirement for Algebra 1 and/or English 10.”*

- Is this proposal intended to apply ONLY to students who are first-time test takers of Algebra 1 and/or English 10 in the same school year in which they graduate, limited to the school years 2016-2017 and 2017-2018? As it is written, *“in those school years”* might be interpreted that the proposal applies also to students who are first-time test takers in 2016-2017 and graduates in 2017-2018.
- For those who fail the course(s) and do not graduate, are they required to pass the related PARCC test to eventually meet graduation testing requirements? Will their participation satisfy the testing requirement?
- What is the rationale for limiting this proposal to 2016-2017 and 2017-2018? Is this to allow for the PARCC Transition? Is this to allow for the transition to the new Bridge Projects? Curious, not complaining. It is difficult to apply exemptions only when students graduate in the same year. It requires a monitoring process like the waivers.

.09 C. Exception to Passing Score Requirement (1): *“For students who are graduating in school years 2016 – 2017 and 2017 – 2018 and who are first-time test takers during those school years of the Maryland High School Assessment in Algebra 1 and/or English 10, the requirements set forth in B(3)(a) of this regulation do not apply. For those students only, taking the Algebra 1 and/or English 10 Maryland High School Assessment for the first time will meet the graduation assessment requirement for Algebra 1 and English 10.”*

- Why is it necessary to have both .06 G. and .09 C. (1)?

Students who passed the PARCC-related course(s) prior to 2016-17 but who have not yet taken the PARCC test(s): Are these students now required to pass the PARCC assessment(s)?

.09 B (3) (d) Substitute Scores: *"If a student has not achieved a passing score on the Maryland High School Assessment in English 10 and/or Algebra 1, achieve a score as established by the Department on Department-approved assessments substitute for algebra, and/or English, aligned with the Maryland High School Assessments such as Advanced Placement examinations, SAT, ACT, and International Baccalaureate examinations;"*

- What are the approved SAT and ACT scores that would enable a student to meet the testing requirement in Algebra 1 and/or English 10? We assume the AP scores are 3, 4, 5 and IB scores are 4, 5, 6, 7.

MHSA Requirement & CCRCCA: The proposal of meeting Alg 1 and Eng 10 testing requirements through AP scores, IB scores, SAT scores, and ACT scores is also a component of CCRCCA. Some students will be meeting both testing and college-career ready requirements through scores on these tests.