



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

TO: Members of the State Board of Education

FROM: Karen B. Salmon, Ph.D.

DATE: May 25, 2021

SUBJECT: COMAR 13A.03.02
Graduation Requirements for Public High Schools in Maryland
COMAR 13A.04.01
Requirements for Computer Science, Engineering, or Technology Education Instructional Programs
COMAR 13A.04.09
Program in Science
ADOPTION

PURPOSE:

The purpose of this item is to request adoption of the amendments to COMAR 13A.03.02 *Graduation Requirements for Public High Schools in Maryland*, COMAR 13A.04.01 *Requirements for Computer Science, Engineering, or Technology Education Instructional Programs*, and COMAR 13A.04.09 *Program in Science*. These amendments were the result of the recommendations of the Maryland High School Graduation Task Force, as reviewed and accepted by the State Board.

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:

The Maryland High School Graduation Task Force was first convened in January 2018 at the request of the State Board and the State Superintendent of Schools. The Task Force was to make recommendations to the Board and Superintendent on the Code of Maryland Regulations (COMAR) 13A.03.02 *Graduation Requirements for Public High Schools in Maryland*. Specifically, the Task Force was asked to focus on three areas: credit and program requirements (number of credits, subject areas, and other requirements), assessments, and options for awarding high school diplomas. All decisions were informed by current research, data, and experts.

Twenty-four organizations and stakeholder groups were invited to have a representative sit on the Task Force. The Task Force was co-chaired by Dr. Carol Williamson, Deputy Superintendent, Office of Teaching and Learning, and Dr. Dara Shaw, Executive Director, Office of Research.

The recommended amendments to credits, beginning with the ninth grade class of 2021-2022, include an increase in the number of credits required for graduation from 21 to 22, an increase in the number of credits in mathematics from three to four, and an increase in the number of credits in health from one-half credit to one credit. Computer science and engineering would be added to the subject of technology education. Advanced technology would be deleted from the completer options. The graduation requirement that students must pass assessments in algebra, English, science, and government would move from a stand-alone assessment requirement to an end-of-course assessment requirement, which would count for 20 percent of the student's final grade in the respective course. This requirement would begin in the 2022-2023 school year. Clarification of the assessment requirements for students is included. In the 2020-2021 and 2021-2022 school years, taking the Maryland Comprehensive Assessment in algebra, English, science, and government will meet the graduation requirement. Students graduating in the 2020-2021 school year are not required to take the assessment in government. Students would be able to earn two State endorsements, which could be added to their diploma, including a College Ready State Endorsement and/or a Career and Technical Education State endorsement. Amendments include clarification of the requirements and content in science, government, and computer science, engineering, or technology education. Language moving from Maryland High School Assessments to the Maryland Comprehensive Assessment Program is corrected throughout the regulation.

EXECUTIVE SUMMARY:

The proposed amendments to COMAR 13A.03.02 *Graduation Requirements for Public High Schools in Maryland*, COMAR 13A.04.01 *Requirements for Computer Science, Engineering, or Technology Education Instructional Programs*, and COMAR 13A.04.09 *Program in Science* reflect the thoughtful work of the Maryland High School Graduation Task Force and the State Board to enhance the graduation requirements, adopt increased rigor, and move from stand-alone assessments to end-of-course assessments.

The State Board reviewed the amendments at the January 26, 2021, State Board meeting and granted permission to publish. The amendments were published in the Maryland Register from April 9, 2021, to May 10, 2021. For COMAR 13A.03.02 *Graduation Requirements for Public High Schools in Maryland*, the MSDE received 13 comments. For COMAR 13A.04.01 *Requirements for Computer*

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Science, Engineering, or Technology Education Instructional Programs, there were no comments. For COMAR 13A.04.09 *Program in Science*, there was one comment. A summary of the comments along with a copy of each submission is attached. The comments were overall in support of the amendments. Questions that were submitted apply to the details of implementation that will be addressed in guidance that will be provided upon adoption of the regulations. Based on a thorough review of all of the comments, the MSDE does not recommend any revisions to the regulations.

ACTION:

Request adoption of the amendments to COMAR 13A.03.02 *Graduation Requirements for Public High Schools in Maryland*, COMAR 13A.04.01 *Requirements for Computer Science, Engineering, or Technology Education Instructional Programs*, and COMAR 13A.04.09 *Program in Science*.

ATTACHMENTS:

COMAR 13A.03.02 *Graduation Requirements for Public High Schools in Maryland*
COMAR 13A.04.01 *Requirements for Computer Science, Engineering, or Technology Education Instructional Programs*
COMAR 13A.04.09 *Program in Science*.
Comment Summary
Comment Submissions

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, 7-203, 7-205, 7-205.1, and 8-404, Annotated Code of Maryland

.02 Definitions.

A. (text unchanged)

B. Terms Defined.

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

(2)—(5) (text unchanged)

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

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

[(7)] (8) “Minimum score” means an acceptable score established by the Department below the passing score on a Maryland [High School] *Comprehensive* Assessment that may be used by a student to satisfy the combined score option.

[(8)] “PARCC Assessment” means the assessments in algebra and English aligned with the Maryland Standards.]

.03 Enrollment and Credit Requirements.

A. (text unchanged)

B. To be awarded a diploma, a student *who entered the 9th grade class in the 2020—2021 school year or earlier* shall be enrolled in a Maryland public school system and shall have earned a minimum of 21 credits that include the following specified credits:

(1) English — four credits of organized instruction in comprehension of literary and informational text, writing, speaking and listening, language, and literacy, of which one credit shall be aligned with the Maryland [High School] *Comprehensive* Assessment for English;

(2) Fine Arts — one credit in [visual arts, music, theater, or dance,] *dance, media arts, music, theatre, or visual art*, or a combination of these;

(3) Mathematics — three credits, including one with instruction in algebra aligned with the Maryland [High School] *Comprehensive* Assessment for algebra or one or more credits in subsequent mathematics courses for which Algebra I is a prerequisite, and one with instruction in geometry aligned with the content standards for geometry;

(4)—(5) (text unchanged)

(6) Science — three credits of organized instruction which includes a laboratory component engaging in the application of the science and engineering practices, the crosscutting concepts, and disciplinary core ideas including Earth/space science, life science, physical science (chemistry and physics), engineering, and technology, aligned to the Maryland [High School] *Comprehensive* Assessment for science;

(7) Social studies — three credits including one credit in United States history, one credit in world history, and one credit in local, State, and national government aligned with the Maryland [High School] *Comprehensive* Assessment for government;

(8)—(9) (text unchanged)

C. *Beginning with students entering the 9th grade class in the 2021—2022 school year, to be awarded a diploma, a student shall be enrolled in a Maryland public school system and shall have earned a minimum of 22 credits that include the following specified credits:*

(1) *English — four credits of organized instruction in comprehension of literary and informational text, writing, speaking and listening, language, and literacy, of which one credit shall be aligned with the Maryland Comprehensive Assessment for English;*

(2) *Fine arts — one credit in dance, media arts, music, theatre, or visual art, or a combination of these;*

(3) *Mathematics — four credits, including one with instruction in algebra aligned with the Maryland Comprehensive Assessment for algebra or one or more credits in subsequent mathematics courses for which Algebra I is a prerequisite, and one with instruction in geometry aligned with the content standards for geometry;*

(4) *Physical education — one-half credit;*

(5) *Health education — one credit;*

(6) *Science — three credits, designed to develop scientific literacy with all courses integrating the application of the science and engineering practices, crosscutting concepts, and each containing a laboratory component, including one credit in life science aligned to the Maryland Comprehensive Assessment for Life Science; one credit in physical*

science (including chemistry, physics, or integrated physical science); and one credit in Earth/space science or a course with the topics of Earth/space science integrated;

(7) Social studies — three credits including one credit in United States history, one credit in world history, and one credit in local, State, and national government aligned with the Maryland Comprehensive Assessment for government;

(8) Computer science, engineering, or technology education — one credit that includes the study of computers and algorithmic processes or the application of knowledge, tools, and skills to solve practical problems and extend human capabilities; and

(9) One of the following:

(a) Two credits of the same world language, which may include two credits of American Sign Language; or

(b) Successful completion of a State-approved career and technical education program.

[C.] D.—[D.] E. (text unchanged)

.04 Other Provisions for Earning Credit.

A. In addition to earning credits during the regular school day and year, credits may be earned, at the discretion of the local school system, through the means specified in §§B — [I] H of this regulation.

B.—C. (text unchanged)

D. Online Courses.

(1) (text unchanged)

(2) If credit is to be applied toward minimum graduation requirements, the Department-approved online course shall be provided by the local school system *or through a Maryland Higher Education Institution as part of dual enrollment, as set forth in Education Article, §18-14-01, Annotated Code of Maryland.*

[E.] Tutoring.

(1) Tutoring may be considered only after all the resources of the school system have been used fully and when it is determined that the best interests of the students are being served.

(2) If tutoring is recommended by the school and approved by the local school system for credit to be applied toward minimum graduation requirements, then the tutor, the program of study, and examination shall be provided by the local school system.]

[F.] E. (text unchanged)

[G.] F. College Courses. Consistent with the payment requirement of Education Article, §§18-14A-04 and 18-14A-05, Annotated Code of Maryland, local school system policies and procedures [and with] prior approval of the local superintendent of schools or the superintendent's designee, *and aligned with the Maryland College and Career Ready Standards or an elective credit for graduation requirements*, credit toward high school graduation [may] *shall* be given for courses offered by accredited colleges.

[H.] G. (text unchanged)

[I.] H. Credit Through Examination.

(1) Credit toward high school graduation may be earned by passing an examination that assesses student demonstration of local school system curricular objectives, *which are based on the Maryland State Standards.*

(2)—(3) (text unchanged)

.06 Maryland [High School] Comprehensive Assessments.

A. A student shall take the requisite Maryland [High School] *Comprehensive Assessment* during its next regular administration if the student received credit for taking, by the methods identified in Regulations .03 and .04 of this chapter, any of the following courses aligned with the Maryland [High School] *Comprehensive Assessment*:

(1)—(4) (text unchanged)

B. To be awarded the Maryland High School Diploma, all students, including elementary and middle school students who take high school level courses, shall take the Maryland [High School] *Comprehensive Assessment* for algebra, science, English, and government after the student completes the required course or courses.

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

D. Bridge Plan for Academic Validation.

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

(a) Failed one or more Maryland [High School] *Comprehensive Assessments*;

(b)—(d) (text unchanged)

(e) Participated successfully in appropriate assistance as defined in §C of this regulation after having failed one or more of the Maryland [High School] *Comprehensive Assessments*.

(2) A student may begin a Bridge Project after one failure of a Maryland [High School] *Comprehensive Assessment*.

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

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

(a) Specific modules developed by the Department in each of the Maryland [High School] *Comprehensive Assessments* content areas;

(b)—(f) (text unchanged)

E. Reporting Student Performance.

(1) (text unchanged)

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

[F. If the student is graduating in the school year 2017—2018 and is a first time test taker of Algebra I or English 10 in that school year and has passed the courses but failed the Maryland High School Assessment aligned with those courses, that student is exempt from completing a Bridge Project and will have met the assessment requirement for Algebra I and/or English 10.]

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

(1) The student has passed the Algebra I course, English 10 course, science course, and government course; and

(2) The student takes the Algebra I, English 10, science, and government Maryland *Comprehensive* Assessment aligned with the course.

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

H. Beginning with the 2022—2023 school year, at the latest:

(1) A student shall take the requisite Maryland *Comprehensive* Assessment during its regular administration if the student is taking, by the methods identified in Regulations .03 and .04 of this chapter, any of the following courses aligned with the Maryland *Comprehensive* Assessment:

(a) Algebra;

(b) English;

(c) Science; or

(d) Government; and

(2) The Maryland *Comprehensive* Assessment for algebra, English, science, and government shall account for 20 percent of the student’s final grade in the respective high school level algebra, English, science, and government course.

I. Reporting Student Performance.

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

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

.07 Notice to Parents or Guardians and Students.

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

A. (text unchanged)

B. The student’s progress on fulfilling the credit, Maryland [High School] *Comprehensive* Assessment, service, and applicable IEP requirements for graduation;

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

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

E. The Department’s schedule for the Maryland [High School] *Comprehensive* Assessment administration; and

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

.08 Grading and Reporting.

A. (text unchanged)

B. Each local school system shall develop a written policy on grading and reporting that complies with the student record requirements as set forth in COMAR 13A.08.02 and that includes:

(1)—(2) (text unchanged)

(3) An explanation of weights of honors, Advanced Placement, International Baccalaureate, [and/or] and dual enrollment courses;

(4)—(5) (text unchanged)

C.—D. (text unchanged)

.09 Diplomas and Certificates.

A. (text unchanged)

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

(1)—(2) (text unchanged)

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

- (a) Achieve a passing score on the Maryland [High School] *Comprehensive* Assessments for Algebra I, science, government, and English 10;
- (b) Achieve a combined score(s) as established by the Department on the Maryland [High School] *Comprehensive* Assessments;
- (c) Achieve a passing score on an approved alternative assessment as established by the Department, such as Maryland [High School] *Comprehensive* Assessment for Algebra II, Advanced Placement examinations, SAT, ACT, or International Baccalaureate examinations; or
- (d) (text unchanged)

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 I 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 I and/or English 10 Maryland High School Assessment for the first time will meet the graduation assessment requirement for Algebra I and English 10.

(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.]

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

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

(3) (text unchanged)

D. (text unchanged)

E. Maryland High School Certificate of Program Completion.

(1)—(5) (text unchanged)

(6) Certificate Endorsement.

(a) Beginning with the 2024—2025 school year, students completing a Certificate may earn one or more endorsements.

(b) The endorsements include a Post-Secondary Education endorsement, a Work-Ready/Employment/Career endorsement, and a Community/Citizenship endorsement.

(c) Requirements for the endorsements will be identified by the Department.

F.—G. (text unchanged)

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

(1) Complete the enrollment, credit, assessment and service requirements as specified in this chapter; and

(2) Complete local school system requirements.

I. State Endorsements.

(1) Beginning with the 2024—2025 school year, students graduating may earn a College Ready State endorsement, a Career and Technical Education (CTE) State endorsement, or both.

(2) The Department will establish the requirements for the endorsements.

.09-1 Appeal of Denial of Diploma for Failure to Meet Maryland [High School] *Comprehensive* Assessment Requirement.

A. A school system shall notify each senior and the senior's parents or guardians on or before the end of February of the senior year if a student may not graduate. The notice shall explain:

(1)—(2) (text unchanged)

(3) That a waiver of the Maryland [High School] *Comprehensive* Assessment graduation requirement may be one of the options, if the student meets the criteria set forth in §§C and E of this regulation;

(4)—(5) (text unchanged)

B. (text unchanged)

C. On or before April 1, the school system shall identify each student who may fail to graduate because:

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

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

D. (text unchanged)

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

(1) The student meets the following criteria:

(a) (text unchanged)

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

(c) (text unchanged)

(2) The student is prevented from meeting the Maryland [High School] *Comprehensive* Assessment graduation requirements because:

(a) (text unchanged)

(b) The student experienced a special, extraordinary, or extenuating circumstance or combination of circumstances preceding the administration of the most recent Maryland [High School] *Comprehensive* Assessment, such as a recent death in the immediate family, a serious or prolonged illness or pregnancy with medical complications, an accident causing serious injury, or a destructive house fire;

(c) (text unchanged)

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

F. On or about April 1, the principal shall notify the student and the student's parents or guardians that the student is being considered for a waiver of the Maryland [High School] *Comprehensive* Assessment graduation requirements that the student has not fulfilled to date. The notice shall explain the waiver decision-making process.

G. On or before May 1, the principal of the high school shall make a Maryland [High School] *Comprehensive* Assessment waiver recommendation to the local superintendent for each student who meets the criteria set forth in §E of this regulation with the participation of:

(1)—(4) (text unchanged)

H.—K. (text unchanged)

L. The decision of the State Superintendent may be appealed to the circuit court pursuant to Maryland Rules 7-201, et seq. On appeal:

(1) If the State Superintendent has reversed the local superintendent's decision to deny the Maryland [High School] *Comprehensive* Assessment waiver and the local school system appeals that decision, the State Superintendent shall defend the decision on appeal; or

(2) (text unchanged)

M.—N. (text unchanged)

.10 Alternatives to 4-year Enrollment Requirement.

A. (text unchanged)

B. Early College Admission Program. A student may receive a Maryland High School Diploma through acceptance in the early college admission program, if:

(1) (text unchanged)

(2) All Maryland [High School] *Comprehensive* Assessments and student service requirements have been met;

(3) A written request by the student and parent or guardian is made to and approved by the local superintendent of schools certifying the early admission acceptance;

(4)—(5) (text unchanged)

C. Early Admission to Approved Vocational, Technical, or Other Postsecondary School Program. A student may receive a Maryland High School Diploma through acceptance in an early admission program of an approved vocational, technical, or postsecondary school program if:

(1) (text unchanged)

(2) All Maryland [High School] *Comprehensive* Assessments and student service requirements have been met;

(3)—(5) (text unchanged)

.12 General Provisions.

A. (text unchanged)

B. Graduation Requirements for Transfer Students.

(1) (text unchanged)

(2) Maryland [High School] *Comprehensive* Assessment Exemption Requirements.

(a) A student who transfers from a nonpublic school or a school out of State is exempt from one or more of the Maryland [High School] *Comprehensive* Assessments if, consistent with local school system policy and procedure, the local superintendent determines that the course taken is aligned with the relevant Maryland [High School] *Comprehensive* Assessment and awards the student credit for taking any of the courses aligned with the Maryland [High School] *Comprehensive* Assessments, that is, algebra, science, English, or government, or all of these, in accordance with the principles set forth in §B(2)(c) of this regulation.

(b) A student who transfers from a nonpublic school or a school out of State and has not received credit for algebra but has demonstrated mastery of the Maryland College and Career Ready Standards for algebra either through an evaluation or successful completion of subsequent mathematics courses for which algebra is a prerequisite is exempt from the Maryland [High School] *Comprehensive* Assessment for algebra.

(c) To award credit for taking any of the courses aligned with the Maryland [High School] *Comprehensive* Assessments, that is, algebra, science, English, or government, a principal shall determine through the following considerations whether the transfer student demonstrates subject matter knowledge aligned with the content standards for the subject:

(i)—(iv) (text unchanged)

(d) A student who transfers from a nonpublic school or from a school out of State into a local school system after the first semester of his or her senior year is exempt from the Maryland [High School] *Comprehensive Assessment Requirements*.

(e) (text unchanged)

(3)—(4) (text unchanged)

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

Title 13A STATE BOARD OF EDUCATION

Subtitle 04 SPECIFIC SUBJECTS

Chapter 01 Programs in *Computer Science, Engineering, or Technology Education*

Authority: Education Article, §2-205(c) and (h), Annotated Code of Maryland

.01 Requirements for *Computer Science, Engineering, or Technology Education Instructional Programs*.

A. Each local school system shall offer a *computer science, engineering, or technology education* program in grades 9—12 which shall enable students to:

(1) (text unchanged)

(2) Select [advanced technology] *computer science, engineering, or technology* electives *or career and technical education (CTE) programs of study*.

B. Maryland *Computer Science, Engineering, or Technology Education Program*. The comprehensive instructional program shall:

(1) (text unchanged)

(2) Include the Maryland [Technology Education Content Standards in §§C—G of this regulation] *K-12 Computer Science Standards for Technological and Engineering Literacy, or both*.

[C. The Nature of Technology. Students shall develop an understanding of the nature of technology through:

(1) Its characteristics, scope, and core concepts;

(2) The relationships among technologies; and

(3) The connections between technology and other fields of study.

D. Impacts of Technology. Students shall develop abilities to assess the impacts of technology by:

(1) Identifying its cultural, social, economic, political, and environmental effects; and

(2) Understanding the role of society in the development and use of technology.

E. Engineering Design and Development. Students shall demonstrate knowledge of and apply the engineering design and development process through:

(1) Research and development;

(2) Invention and innovation;

(3) Problem solving; and

(4) Using and maintaining technological products and systems.

F. Core Technologies. Students shall demonstrate knowledge of and skills related to the core technologies (biotechnology, electrical, electronics, fluid, materials, mechanical, optical, structural, and thermal), the building blocks of the designed world, by studying their functions and applying them in common technology systems.

G. The Designed World. Students shall demonstrate knowledge of the major enterprises that produce the goods and services of the designed world, which include:

(1) Medical, agricultural, and biotechnology;

(2) Energy and power;

(3) Information and communication;

(4) Transportation; and

(5) Manufacturing and construction technologies.

H. Maryland Advanced Technology Education Electives. An instructional program that meets the credit requirement specified in COMAR 13A.03.02.04 for advanced technology education in which students in the high school learning years shall develop in-depth skills and understanding related to one or more of the following:

(1) Impacts of technology;

(2) Technological issues; and

(3) Engineering design.]

[I.]C. Curriculum Documents. Consistent with Education Article, §4-111, Annotated Code of Maryland, each local school system shall provide *computer science, engineering, or technology education* curriculum documents for the secondary schools under its jurisdiction that:

(1) Include the content standards set forth in [§§C—G] §B of this regulation; and

(2) Are aligned with the State [Curriculum] *standards*, as developed by the Maryland State Department of Education in collaboration with local school systems.

[J.]D. Student Participation. Each student shall have the opportunity to participate in the *computer science, engineering, or technology* education program required by this chapter.

.02 Certification Procedures.

By September 1, 2007, and each 5 years after that, each local superintendent of schools shall have certified to the State's Superintendent of Schools that the instructional programming within grades 9—12 meets, at a minimum, the requirements set forth in [Regulation .01C—G] *Regulation .01B—C* of this chapter.

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

Title 13A

A STATE BOARD OF EDUCATION

Subtitle 04 SPECIFIC SUBJECTS

13A.04.09 Program in Science

Authority: Education Article, §2-205(h), Annotated Code of Maryland.01 Science Instructional Programs for Grades Prekindergarten — 12.

A. (text unchanged)

B. Maryland Science Program. The comprehensive instructional program shall provide for the diversity of student needs, abilities, and interests at the early, middle, and high school learning years, and shall include *all* the Maryland College- and Career-Ready Next Generation Science Standards (NGSS) *for all students as* set forth in [§§C—G] §§C—H of this regulation.

C. (text unchanged)

D. *Crosscutting Concepts. Students shall demonstrate an understanding of the concepts that unify the study of science through their common application across fields in the major disciplines of natural science.*

[D.] E. (text unchanged)

[E.] F. Life Science [including Biology and Environmental Science]. Students shall demonstrate an understanding of the key concepts that make sense of the life sciences which focus on patterns, processes, and relationships of living organisms.

[F.]G.— [G.] H. (text unchanged)

[H.]I. Curriculum Documents. Consistent with Education Article, §4-111, Annotated Code of Maryland, each local system shall provide science curriculum documents for the elementary and secondary schools under its jurisdiction that:

(1) Include the Maryland College- and Career-Ready Next Generation Science Standards (NGSS) set forth in [§§C—G] §§C—H of this regulation; and

(2) (text unchanged)

[I.]J. (text unchanged)

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

**COMAR 13A.03.02 Graduation Requirements for Public High Schools in Maryland
Summary of Comments (a complete copy of each of the submissions is attached)**

Submitted by:	Summary of Comments	MSDE Response
<p>Michael A. Watson, Director of Facility Coordination, Health & Physical Education, and Athletics, St. Mary's County Public Schools (email dated 4/12/21)</p>	<ul style="list-style-type: none"> • “The proposed changes are thoughtful, have been based on research, vetted by many professional organizations, and feedback given by a large and diverse group of stakeholders.” Communication includes concerns expressed with the timing of the implementation. 	<p>The Maryland State Department of Education (MSDE) will be offering modules for staff training. Health will require one credit for graduation; however, the course can be offered over two separate semesters. The requirement will not be needed for graduation until 2025 which will allow school systems time to provide the course(s) and for students to earn the credit. A framework, standards, sample program of studies course descriptions, suggested school system action items, timelines, etc. have or are being developed to support this implementation.</p> <p>The increase in mathematics credit for graduation aligns with the statute which requires students to take mathematics in each year of high school. This requirement began with the 9th grade class of 2014.</p>
<p>Richard Schell, Physical Education Teacher, Wicomico County (email dated 4/14/21)</p>	<ul style="list-style-type: none"> • “On surface value – yes Kiddos should be informed/more informed regarding health. However, I think I personally need more information before I can endorse this. Will this additional ½ credit be at the expense of something else, for example dropping ½ PE credit. I cannot think of anything I would see sacrificed.” 	<p>MSDE responded to the writer that the increase in the health credit does not reduce physical education or other course requirements.</p>

Submitted by:	Summary of Comments	MSDE Response
<p>Teresa Shatzer, Parent, Health Educator, Advocate & Dr. Cara Grant, Chairperson of Maryland State Advisory Council on Health and Physical Education & Susan Soule, Health Educator, Advocate (email dated 5/5/21)</p>	<ul style="list-style-type: none"> This letter comes to you in overwhelming support of the additional half credit graduation requirement for Health Education proposed in COMAR 13A.03.02 Graduation Requirements for Public High Schools in Maryland. 	<p>The MSDE appreciates the support for the .5 increase in the health credit and the rationale for the need.</p>
<p>Rachel London, Esq., Executive Director, Maryland Developmental Disabilities Council (letter dated 5/7/21)</p>	<ul style="list-style-type: none"> We applaud the Division of Early Intervention and Special Education Services (EI/SES) for making secondary transition a focus. The effort to ensure students with disabilities, including students with the most significant disabilities, are prepared for post-secondary options has increase opportunities for students across Maryland. 	<p>MSDE appreciates the support for the amendments to the regulation. The comment includes recommendations/ next steps to support the implementation including a task force for each endorsement area.</p>
<p>Stacy Shack, Local Accountability Coordinator, Baltimore County Public Schools (letter dated 5/7/21)</p>	<ul style="list-style-type: none"> The comments include questions related to the inclusion of language in the area of definitions, assessments, notice to parents/guardians and students, and diplomas and certificates which remains in the regulation until the full implementation of the amendments. 	<p>Since there are students who will be graduating prior to the implementation of the end-of-course assessments, combined score, Bridge Plan, notification to parents, diploma and certificate COMAR language had to remain for now. Upon full implementation of the end of course assessments, the MSDE will bring forward to the State Board revisions to delete certain sections of COMAR 13A.03.02. The MSDE will develop guidance for local school systems upon the full adoption of the regulation.</p>

Submitted by:	Summary of Comments	MSDE Response
<p>Jeanette Ortiz, Legislative & Policy Counsel, Anne Arundel County Public Schools (letter dated 5/10/21)</p>	<p>Overall, the proposed revisions appear to be positive for students and, in general, AACPS is supportive. While AACPS appreciates the effort to ensure that Maryland graduation rates are rigorous, we have questions and concerns about some of the proposed amendments to COMAR 13A.03.02 Graduation Requirements for Public High Schools in Maryland.</p>	<p>The move to the MD Comprehensive Assessments becoming an end-of-course assessment was a major recommendation of the High School Graduation Task Force which included representatives from the Public School Superintendent’s Association of Maryland (PSSAM). Guidance will be developed with participation/input from local school system individuals on the calculation of grades which will include assessments counting 20 percent of the student’s grade in the course. The student will be required to take the assessment with the score being calculated into the grade. Further guidance will be provided to the local school systems. Regarding students of military families, Maryland school systems have a long history of supporting military students and the Interstate Compact on Educational Opportunity for Military Students supports on-time graduation for students who transfer during their high school years.</p>

Submitted by:	Summary of Comments	MSDE Response
<p>Deborah Gilmartin, Supervisor of State Assessments & Accountability, Frederick County Public Schools (email dated 5/10/21)</p>	<ul style="list-style-type: none"> I am writing in support of making graduation assessments 20% of a student's final grade in algebra, English, science, and government. However, with that new requirement, we feel there are confusions over the necessity for and implementation of the Bridge Plan or the combined score method. 	<p>See response above. In addition, language on the bridge plan and combined score is included while the regulation needs to continue to reflect present policy for students who fall under the current regulations. A student will not be able to use the score on one assessment to offset the score on another assessment in the end-of course assessment model. Further guidance will be developed and shared upon the adoption of the proposed amendments to the regulation. Waivers that have been approved by the State Board apply to identify students for the indicated school years.</p>

Submitted by:	Summary of Comments	MSDE Response
<p>Cynthia Simonson, President & Rodney Peele, Vice President for Educational Issues, Montgomery County Council of Parent- Teacher Associations (letter dated 5/10/21)</p>	<ul style="list-style-type: none"> • Broadly, we support proposed changes that increase flexibility and options for every child and oppose changes that have more burden than benefit for high school students. 	<p>Students entering the 9th grade in the 2021-2022 school year will have four years to meet the additional graduation requirements. The additional credit in mathematics aligns the graduation requirements with the present statute requiring students to take mathematics each year in high school. This requirement began with the 9th grade class of 2014. It was the recommendation of the High School Graduation Task Force and the State Board that health education provides students multiple opportunities to gain the knowledge, attitudes, and skills needed for improved health status during adolescence. With the recent experiences of students since March 2020, the requirement is ever more important. Changing the high school assessments from high stakes assessment to an end-of-course assessment has been described in responses to previous comments.</p>

Submitted by:	Summary of Comments	MSDE Response
<p>Steve Mather, Assistant Principal, Maryland School for the Deaf, Frederick Campus (letter dated 5/10/21)</p>	<ul style="list-style-type: none"> • While MSDE recognizes and addresses the fundamental barriers faced by students with disabilities, the unique lifelong communication obstacles that are faced by students who are deaf or hard of hearing need to be considered. The Maryland School for the Deaf is a public school that provides full, direct access to all students in a bilingual education in American Sign Language (ASL) and English. An ongoing challenge for MSD is partnering with other schools, programs, or organizations that do not provide full access in both languages. 	<p>This response is in response to the four submissions from staff of the Maryland School for the Deaf.</p> <p>The MSDE appreciates the comments regarding the regulation. In your correspondence, you expressed concern that the revised regulation limits dual enrollment opportunities for deaf students and teachers by restricting dual enrollment to Maryland institutions of higher education. The regulation aligns with Education Article 18-14A-01, which defines a dually enrolled student as a student who is enrolled in a secondary school in Maryland and an institution of higher education in Maryland. There are other options that the Maryland School for the Deaf can implement to maintain partnerships with out-of-state institutions of higher education. For example, the Maryland School for the Deaf can establish articulation agreements or provide the opportunity for students to earn transcribed credit from out-of-state universities. Support will be provided to the MD School for the Deaf in this area.</p>

Submitted by:	Summary of Comments	MSDE Response
<p>Julie Bourne, Teacher, Maryland School for the Deaf, Frederick Campus (letter dated 5/10/21)</p>	<ul style="list-style-type: none"> The number of collegiate STEM programs in Maryland that provide full and direct language access for both deaf students and teachers stands at zero. MSD implemented a workaround that allows its teachers to teach college-level courses on its campus in ASL through partnerships with Frederick Community College and NTID/RIT [<i>National Technical Institute for the Deaf/Rochester Institute of Technology</i>]. These partnerships allow for unfettered access to the course content for the deaf and hard of hearing students and they have been critical in creating viable pathways to college-level enrollments for our students. These partnerships are of paramount importance, because these ASL-based classes are reducing barriers for the deaf and hard of hearing. These efforts go a long way in addressing the deaf/hard-of-hearing underrepresentation in the technician workforce. 	
<p>Calvin D. Doudt, High School Principal, Maryland School for the Deaf, Frederick Campus (email dated 5/10/21)</p>	<ul style="list-style-type: none"> Our students benefit from a partnership with colleges and universities outside of the state of Maryland. In the past, we have partnered with RIT (Rochester Institute of Technology), and with their Project Fast Forward initiative our Deaf and Hard of Hearing students get a jump start on their college journey. This is provided at no cost for all Deaf and Hard of Hearing students and includes full accessibility for both our teachers and students without any language barriers. This is critical for our students since it is an effective way of preparing our students for their post-graduation plans. I ask that you revisit the language related to dual enrollment courses and make a provision that allows deaf students throughout the state to take dual enrollment courses through colleges that have programs for deaf students. 	
<p>Tara M. Holloway, Director of Curriculum and Instruction, Director of Accreditation, MSDE Liaison, Maryland School for the Deaf (letter dated 5/10/21)</p>	<ul style="list-style-type: none"> Language included in these regulations limits course options for deaf students only to Maryland institutions of higher education. 	

Submitted by:	Summary of Comments	MSDE Response
Office of Curriculum and Instructional Programs, Montgomery County Public Schools	<p>Maryland Comprehensive Assessments</p> <p>There are several implications regarding the end-of-course assessment counting as 20% of the student’s final grade in the respective course.</p>	Changing the high school assessments from high stakes assessment to an end-of-course assessment has been described in responses to previous comments.

----- Forwarded message -----

From: **Michael Watson** <mawatson@smcps.org>

Date: Mon, Apr 12, 2021 at 1:59 PM

Subject: Public Comment - COMAR 13A.03.02

To: <mary.gable@maryland.gov>

This is submitted as public comment for COMAR 13A.03.02 Graduation Requirements for Public High Schools in Maryland.

I have kept abreast of the changes that have been proposed. The proposed changes are thoughtful, have been based on research, vetted by many professional organizations, and feedback given by a large and diverse group of stakeholders.

I agree with all proposed changes and do believe that they are good for the students in Maryland Public Schools.

I do have concerns with the timeline of making these changes for incoming Freshmen in the school year 2021-2022. The following are my concerns:

- Concern: Currently, SMCPS only offers five semesterised courses. With the inclusion of a 0.5 credit Health course, semesterised offerings will need to be developed; approval given by our county board to be part of our Program of Studies; materials purchased; and teacher training to teach/implement.
- Concern: Hiring certified Physical Education and Health Education teachers to implement the curriculum as the teacher of record would be a high priority. There are concerns with the number of health educators available to fill these positions. Colleges and universities in the state are reporting very low numbers of graduates in this field. Systems are also struggling with funding every year and that struggle has been compounded by the COVID-19 pandemic. Allocating money for new positions would be problematic with the scheduled implementation for Fall 2021 as our budget is approaching finalization at this time.
- Concern: The SMCPS Program of Studies went to the board in January 2021 to begin the approval process for the 2021-2022 school year and the Program of Studies was fully approved on February 10, 2021. If the recommendations go forward with the proposed timeline, the Program of Studies will need to be revised, brought forth to our local board of education for approval, the revised approved revisions completed, and the Program of Studies re-published, and the school system prepared to implement these changes with incoming Freshmen.
- Concern: The new MSDE Health Framework was approved this past year and included Health II in the development stages. However, at the local level we would need to develop curriculum, pacing guides, assessments, resources, etc. in a short amount of time. This also has costs associated with it and we reiterate these budgetary concerns.

- Concern: Changing the graduation requirement from 21 to 22 credits has a great potential to impact graduation rates. (Passing 1.0 credits for Health, 4.0 credits for Math). We need time to examine, in particular, our mathematics course offerings to ensure that we are providing meaningful mathematics courses with more embedded access points, scaffolding, and “just in time remediation” components. This again, will take time and money.

I respectfully request that consideration be given to having these graduation requirements be put into effect for the Freshmen entering our schools in the 2022-2023 school year.

Thank you for considering this public comment as you work to pass this very important legislation for the students of Maryland.

Michael A. Watson
Director of Facility Coordination,
Health & Physical Education, and Athletics
St. Mary's County Public Schools
27190 Point Lookout Rd.
Loveville, MD 20656
301-475-4256, x34143

----- Forwarded message -----

From: **Richard Schell** <rschell@wcboe.org>

Date: Wed, Apr 14, 2021 at 2:28 PM

Subject: public comment regarding health requirement.

To: mary.gable@maryland.gov <mary.gable@maryland.gov>

On surface value – yes Kiddos should be informed/more informed regarding health. However, I think I personally need more information before I can endorse this. Will this additional ½ credit be at the expense of something else, for example dropping ½ PE credit.

I cannot think of anything I would see sacrificed.

Schell

----- Forwarded message -----

From: **Grant, Cara D** <Cara_D_Grant@mcpsmd.org>

Date: Wed, May 5, 2021 at 9:27 AM

Subject: Public Comment: Graduation Requirements

To: mary.gable@maryland.gov <mary.gable@maryland.gov>

Cc: Shatzer, Teresa <Teresa_Shatzer@mcpsmd.org>

Mary Gable and the Maryland State Board of Education,

This letter comes to you in overwhelming support of the additional half credit graduation requirement for Health Education proposed in COMAR *13A.03.02 Graduation Requirements for Public High Schools in Maryland*. Comprehensive health education programs delivered in our schools are strongly linked to students' health by increasing their readiness, efficacy, and ability to engage in protective health behaviors ([CDC: *Adolescents and School Health*](#)). Health education provides students multiple opportunities to gain the knowledge, attitudes, and skills needed for improved health status during adolescence. Furthermore, improved adolescent health has been linked to higher academic achievement and higher high school graduation rates in the finding from the Centers for Disease Control and Prevention (CDC) Youth Risk Behavior Surveillance Survey (YRBSS) ([CDC: *Health-Related Behaviors and Academic Achievement Among High School Students*](#)).

Strategic planning in school health programs such as a comprehensive framework, instructional guides and material, professional development opportunities for teachers, policies, and curriculum implementation of Health Education Standards, allows students to engage in a robust learning experience. The additional time to practice the skills needed to develop protective attitudes and behaviors will enhance the health of our students. This includes structured lessons that are participatory in nature for students to access valid information, analyze influences, set goals and make healthy decisions, communicate effectively, manage emotions and behaviors, and advocate for self and others. Along with the health literacy skills, the [Maryland State Comprehensive Health Education Framework](#) includes critical content in the areas of: mental and emotional health, healthy eating, safety and violence prevention, disease prevention and control, substance abuse prevention, and family life and human sexuality. This structured model of content and health literacy skills is a critical part of a well-rounded education which includes and is directly connected to social and emotional learning (SEL).

In the last year, our nation has experienced extraordinary events that have affected our students, families, educators and communities in ways that significantly impacted our social, emotional, mental and physical state. A comprehensive health education program provides a safe learning environment that addresses all of these aspects as well as equipping our students with useful strategies promoting positive behaviors that they will use for a lifetime.

Thank you for the opportunity to express our support for the additional half credit graduation requirement in Health Education. Our students will benefit tremendously from this positive change in the public high schools in Maryland.

Sincerely,

Teresa Shatzer- Maryland State Parent, Health Educator, Advocate

Dr. Cara Grant- Chairperson of Maryland State Advisory Council on Health and Physical Education

Susan Soule- Maryland State Health Educator, Advocate



Maryland Developmental Disabilities Council

EMPOWERMENT • OPPORTUNITY • INCLUSION

Mary Gable, Assistant State Superintendent
Division of Student Support, Academic Enrichment, and Educational Policy
Maryland State Department of Education
Office of the Deputy for Teaching and Learning
200 West Baltimore Street
Baltimore, Maryland 21201
VIA Email

Re: Comments on COMAR 13A.03.02 – Graduation Requirements for Public High Schools in Maryland

Dear Ms. Gable:

The Maryland Developmental Disabilities Council (Council) envisions a state where people with and without disabilities learn, live, work, and play together. The Council is led by people with developmental disabilities and their families and it is from that perspective that we submit the following comments with regard to the proposed revisions to COMAR about graduation requirements for public high schools in Maryland. Our comments about the regulations focus on the standards for the Maryland High School Certificate of Program Completion. COMAR 13A.03.02.09(E).

We applaud the Division of Early Intervention and Special Education Services (EI/SES) for making secondary transition a focus. The effort to ensure students with disabilities, including students with the most significant disabilities, are prepared for post-secondary options has increase opportunities for students across Maryland. To support this, the Division convened a workgroup to review and provide feedback about the Maryland Certificate Program of Completion. The Council participated and provided significant feedback about the importance of making the Certificate program **meaningful and helpful for students to succeed and achieve post-high school outcomes**. The proposed endorsements for Maryland High School Certificate of Program Completion is critical step to make this happen, and the Council fully supports the inclusion of COMAR 13A.03.02.09(E)(6) – *certificate endorsements*.

We understand the Maryland State Department of Education will identify requirements for each endorsement. COMAR 13A.03.02.09(E)(6)(c). We strongly recommend the following steps to implement the proposed endorsements (as agreed upon in the above-mentioned workgroup):

- Convene a task force for each Endorsement area
 - Formally define Endorsement and Standards per Endorsement area
 - Formally define activities and measures per Standard per Endorsement area
 - Establish required level of mastery for each Standard per Endorsement area
- Seek feedback from various stakeholder groups prior to the adoption of State Endorsements and Standards to the Maryland Certificate of Program Completion
- Develop a data collection system in order to report on Endorsements and Standards earned

In addition, specific professional learning opportunities for students, families, and school staff (including transition coordinators) should be developed and implemented. We also recommend an awareness campaign that includes community partners and employers. This will promote the meaningfulness of the Certificate as well as the Endorsements.

We understand the Division of EI/SES is committed to making this happen. The Council applauds their commitment to get input from stakeholders, the development of a communication plan, and outreach to employers and institutes of higher education. This will ensure the entire state is aware of these new possibilities and opportunities for students with disabilities.

Thank you for the opportunity to provide comments. If you have any questions or concerns, please contact me at RLondon@md-council.org or 410.533.1929.

Sincerely,

A handwritten signature in black ink that reads "Rachel London". The signature is written in a cursive, flowing style.

Rachel London
Executive Director

cc: Marcella Franczkowski, Assistant State Superintendent

BALTIMORE COUNTY PUBLIC SCHOOLS

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

Division of Research, Accountability, and Assessment
Dr. Monique Wheatley-Phillip
Chief Accountability and Performance Management Officer

Office: 443-809-0319
Fax: 410-391-7260

TO: Ms. Mary L. Gable
Assistant State Superintendent

FROM: Ms. Stacy Shack
Local Accountability Coordinator

DATE: May 7, 2021

SUBJECT: Public Comment on COMAR changes to Assessment Graduation Requirements

The Maryland State Department of Education (MSDE) has requested changes to COMAR regulations for assessment graduation requirements. Based on recommendations from the High School Graduation Task Force, MSDE is seeking to move the graduation assessments in Algebra, science, English, and government to end-of-course assessments. Public comment on these changes is due to Dr. Mary Gable at MSDE by May 10, 2021. MSDE plans to share comments and seek approval from the State Board of Education at the May 25, 2021, Board meeting. We have compiled concerns about the changes being proposed below.

13.A.03.02.02 Definitions

- Is the term “Combined Score” relevant?
 - In subsequent section 13.A.03.02.06 section F it indicates students only need to take the test to have met the graduation requirements.
 - In subsequent section 13.A.03.02.06 section H, students only need to take the test and participation is recorded student’s performance record card.
- Is the term “minimum score” relevant?
 - Minimum scores have not been used for several years in Maryland.

13.A.03.02.06 Maryland Comprehensive Assessments

- With the proposed revisions, The Bridge Plan section (13.A.03.02.06 D) is not consistent with the proposed language of the COMAR changes.

- In subsequent sections 13.A.02.06 F and H, the testing and reporting requirement is that students must take the test. There is no mention in the revised language to indicate students will be required or have the opportunity to retest.
- The Bridge Plan language indicates that a student must fail the test more than once to use a test score to meet the graduation requirement. This language does not match the language for students taking end-of course-assessments. Tests will no longer be a graduation requirement.
- Test scores will become part of a student’s final grade for graduation requirements beginning in 2022-2023.
- With the proposed revisions, the Reporting Student Performance section (13.A.03.02.06 E) is not consistent with the proposed language of the COMAR changes.
 - This section states, with the exception of the 2020–2021 and 2021–2022 school years (section F), student have “met all assessment requirements” by achieving a passing score on all Maryland Comprehensive Assessments, or meeting the requirements of the combined score option, or successfully completing a Bridge Project.
 - Section 13.A.02.07.F states that beginning in 2022-2023, students will participate in EOY assessments as a part of their course grade to meet the graduation requirement. This is in opposition to Section E.
 - Furthermore, Section 13.A.02.06.I (2) states that “except for students identified in Section F, met all assessment requirements means having taken the assessments in Algebra, English, science and government.” This is inconsistent with what is provided in section E which mentions achieving a passing score on the assessments.

13.A.03.02.07 Notice to Parents or Guardians and Students

- This section mentions providing the results of each Maryland Comprehensive Assessment or Bridge Project. It is not clear how bridge projects will be applicable with the shift to end-of-course assessments.
- Other sections indicate reporting as “have or have not taken” the assessment. This section seems inconsistent with others.

13.A.03.02.09 Diplomas and Certificates

- Section B (3) delineates students may meet assessment graduation requirements by achieving a passing score on the assessment, achieving a combined score on the assessments, or achieving a passing score on an approved alternate assessment.
 - This language is inconsistent with the change to end-of-course assessments in 13.A.03.02.06.
- .09-1 does not reflect the changes being proposed in shifting from graduation assessments to end-of-course assessments.
 - This section requires identification of students who have taken some or all the Maryland Comprehensive Assessments and failed some or all of them. Students are no longer “passing” assessments. Scores are being incorporated into final grades.

- This section indicates waiver criteria inconsistent with the new end-of-course assessments. Currently, students must pass the course and take the assessment and present extenuating circumstances for review in order to receive a waiver of the assessment requirement. However, with the new language, the assessment is part of a student's final grade. The student will either pass or not pass the course. Not passing the course would cause the student to not meet requirements based on credits earned, not testing.

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



May 10, 2021

Mary L. Gable
Assistant State Superintendent
Division of Student Support, Academic Enrichment and Educational Policy
Maryland State Department of Education
200 W. Baltimore Street
Baltimore, MD 21201

Dear Ms. Gable:

On behalf of Anne Arundel County Public Schools (AACPS), I am submitting this public comment on proposed amendments to COMAR 13A.03.02 Graduation Requirements for Public High Schools in Maryland.

Overall, the proposed revisions appear to be positive for students and, in general, AACPS is supportive. While AACPS appreciates the effort to ensure that Maryland graduation rates are rigorous, we have questions and concerns about some of the proposed amendments to COMAR 13A.03.02 Graduation Requirements for Public High Schools in Maryland. Accordingly, we would like to ensure that certain unintended consequences and potential scenarios that could significantly impact students are considered and addressed throughout this process. AACPS has compiled several questions and comments that we believe will need to be addressed before final adoption of these proposed changes.

Regulation .03 Enrollment and Credit Requirements

Score calculation

- If a district awards .5 credit (for a 1.0 credit course) at the end of each semester, how will the 20% for the Maryland Comprehensive Assessment score be calculated into the grade for each semester?

Credit recovery or retaking a course

- Will a student be required to retake the assessment at the end of credit recovery or will the original score stand?

Regulation .06 Maryland Comprehensive Assessments

Students who pass the Maryland Comprehensive Assessment

- If a student can pass a course without the assessment score, is the student still required to take the assessment?
- If a student is not required to take the assessment, will the student's grade stand or will 0% be factored as the 20% portion of the course grade?
- If the student takes the course one school year and takes the requisite assessment the following year, is the school required to change the grade for that course?
- Are substitute scores from AP and IB assessments still accepted?
- If a student passes or passed the course prior to 2022-2023 but did not take the current assessment, will the student be required to take the new assessment? If the student is required to take the new

assessment, how will this impact the student's original score given that some students may have already shared their transcript with outside recipients?

Students who do not pass the Maryland Comprehensive Assessment

- Since the assessment score is calculated as 20% of a student's course grade, does it matter for the purposes of State requirements whether the student does not pass the assessment?
- If a student fails the assessment, is the student required to retake it?
- Can a student retake the assessment to achieve a passing or a higher score for the course or to increase a course grade? It is important to note that this may occur for high achieving students who are trying to boost their GPA.
- If a student does not pass the course as a result of the assessment, is the student required to retake the entire course?

Regulation .06 Maryland Comprehensive Assessments and Regulation .08 Grading and Reporting

Bridge Plan for Academic Validation

- Will MSDE provide alternatives to assist students who are not strong test takers?
- Bridge Projects are still part of this chapter. As such, how will they be factored into the process?

Other Concerns

Students from military families

AACPS also has concerns regarding the impact these proposed revisions will have on students in military families that transfer to AACPS. Fort George G. Meade is in Anne Arundel County and, as a result, AACPS has a high number of students from military families transferring into our schools each year. Many states across the country do not require four credits in mathematics or a career technology education completer. Given this, we are concerned that a student from a military family who enrolls in AACPS as a senior will be ineligible to graduate in 4 years.

Students receiving English language acquisition and special education services

AACPS has many students receiving English language acquisition (ELA) and special education services. In our experience, students receiving ELA and special education services have experienced difficulties in meeting existing requirements and we are concerned that the proposed additional graduation requirements will have a disparate impact on these student populations. As such, what additional resources will MSDE provide to help ensure that students receiving ELA and special education services are not negatively impacted by the proposed changes?

For all of the above reasons, AACPS respectfully requests that MSDE and the State Board of Education address our questions and concerns regarding COMAR 13A.03.02 Graduation Requirements for Public High Schools in Maryland prior to final adoption.

Sincerely,

Jeanette Ortiz
Legislative & Policy Counsel

cc: Karen B. Salmon, Ph.D., State Superintendent
Clarence C. Crawford, President
George Arlotto, Ed.D., Superintendent
Maureen McMahon, Ph.D., Deputy Superintendent

----- Forwarded message -----

From: **Gilmartin, Deborah L** <Deborah.Gilmartin@fcps.org>

Date: Mon, May 10, 2021 at 3:48 PM

Subject: Comment on COMAR 13A.03.02

To: mary.gable@maryland.gov <mary.gable@maryland.gov>

Cc: Cecilia J. Roe - MSDE (cecilia.roe@maryland.gov) <cecilia.roe@maryland.gov>, Bingman, Jennifer C <Jennifer.Bingman@fcps.org>, Pauline Carey -MSDE- <pauline.carey@maryland.gov>, Brianna Creed (brianna.creed@maryland.gov) <brianna.creed@maryland.gov>, Wood, Gina M <Gina.Wood@fcps.org>

Dear Assistant State Superintendent Gable;

The FCPS System Accountability and School Improvement Team would like to make public comment on the proposed changes to the “Graduation Requirements for Public High Schools in Maryland,” 13A.03.02.

I am writing in support of making graduation assessments 20% of a student’s final grade in algebra, English, science, and government. However, with that new requirement, we feel there are confusions over the necessity for and implementation of the Bridge Plan or the combined score method.

Students who have passed associated courses in school years up until this current school year have earned waivers, and students in the 21-22 school year only have to pass courses and take the associated exams. This means that no student would be eligible to start a bridge. Even during the 2022-2023 school year, when the new requirement that assessments count 20% of the grade, how would a student qualify? For instance, if a student fails a course because a low exam score pulls a course grade below failing, then that student would be required to re-enroll in the course and retest (because the test is always part of the course grade). If true, when would the bridge program be utilized? If the bridge plan is still an alternative to the regular assessment, does the student not begin the bridge plan until the student is in the course for the second time? The answers to these questions are what is missing in the currently proposed regulation.

As explained above, the same arguments can be used regarding the use of the combined score method. No student would receive failing scores until the 2022 – 2023 school year. If a student has a high score (passing) on an Algebra exam, can that student use those extra Algebra exam points to offset a lower English exam score that ultimately affects an English course grade? So far, students have only been able to combine English and Algebra scores. We should either eliminate the combined scores or allow the method across all four exams.

Thank you for considering our questions and comments.

Respectfully,

Deborah Gilmartin
Supervisor of State Assessments & Accountability
Frederick County Public Schools
191 South East Street
Frederick, MD 21701
301-696-6919 Office
301-696-6956 Fax

Montgomery County Council of Parent-Teacher Associations

MCCPTA

everychild.onevoice.

May 10, 2021

Mary L. Gable

Assistant State Superintendent

Division of Student Support, Academic Enrichment, and Educational Policy

Maryland State Department of Education

200 West Baltimore Street

Baltimore, MD 21201

Via mary.gable@maryland.gov

Dear Assistant Superintendent Gable,

On behalf of the Montgomery County Council of PTAs (MCCPTA) and in accordance with the MCCPTA 2020-21 Advocacy Priorities,¹ we offer the following comments on the proposed changes to COMAR 13A.03.02 “Graduation Requirements for Public High Schools in Maryland” (published April 9, 2021).² We thank the Maryland High School Graduation Task Force, the Maryland State Department of Education (MSDE), and the Maryland State Board of Education for the serious and thoughtful work in generating the proposal to enhance graduation requirements and adopt increased rigor.³ The MCCPTA’s Mission is “to make every child’s potential a reality.”⁴ Broadly, we support proposed changes that increase flexibility and options for every child and oppose changes that have more burden than benefit for high school students.

First, we recommend delaying the implementation of any new graduation requirements for one year, to begin with students who enter the 9th grade in the 2022-23 school year. Both students and school systems are emerging from an unprecedented crisis. If these changes are implemented in late May to take effect for students entering high school this fall, then families and Maryland public high schools will have little time to implement appropriate changes to course schedules. Schools and families are already overwhelmingly focused on pandemic recovery, rather than contemplating how these proposed changes may affect course selection at the beginning of 9th grade. None of the credit requirement changes (health, world languages, or tech) were disclosed during the registration period, making changes, if implemented now, a shock to incoming 9th graders, who thought their course schedules more settled. All in all, we see no urgent need to implement changes that would take place in a few months at a time when families already have unusual uncertainty about appropriate coursework this fall.

1

<http://nebula.wsimg.com/df1b2a0058be8c355c467cffd392edf8?AccessKeyId=AB71C8A62DC88BF7171E&disposition=0&alloworigin=1>

2 <http://www.dsd.state.md.us/MDR/4808/Assembled.htm>

3 <http://www.marylandpublicschools.org/stateboard/Documents/2021/0126/Graduation-Requirements-SBOE-Presentation.pdf>

4 <http://www.mccpta.org/our-mission.html>

Second, we recommend against requiring four years of mathematics credit. We understand that 16 other states require 4 credits, and 15 local school systems in MD including Montgomery County already require 4 credits.⁵ Nevertheless, we think the benefits of this requirement are outweighed by the burden it will place on more students throughout the state. We would rather see Montgomery County and other Maryland local school systems scale back their minimum graduation requirements to 3 math credits. The Task Force report cites two main justifications for increasing the math credit requirement. The first justification is that greater exposure to mathematics is linked to better work force outcomes. However, the studies cited mostly do not distinguish between the impact of college education versus the impact of high school mathematics exposure at a college matriculation level. In particular, the studies do not establish that completion of mathematics beyond Algebra II has any impact on students who do not also pursue a college degree. The second justification stated is that “Analysts recommend aligning high school requirements with higher education admission standards, especially as a way to close the ‘preparation gap’ for under-resourced students.”⁶ While universal preparation for the state university system is an admirable goal, we believe that conditioning a high school diploma on such preparation does not accommodate students who might be uninterested in or unsuited to the state university. We fear that many more students will struggle or fail to graduate. As the Task Force itself noted: “Decisions related to graduation requirements should be made with careful consideration of intended and unintended consequences, and any recommendations should, at the very least, ‘do no harm’ to Maryland students. This includes, but is not limited to, making recommendations that increase the likelihood of a student, and especially of students in particular disadvantaged student groups, of earning a high school diploma (or at least not decrease the likelihood).”⁷ We would like to see data outlining the impact on high school graduation rates among students who do not intend to pursue an academic degree in their postsecondary careers.

Third, we oppose the increase in health credits from ½ to 1 year. We understand that Maryland public schools have more and more health or health-related content mandated by the legislature,⁸ and that there is value for students to learn this information. However, we are not convinced that doubling the length of the health course, into a year-long course, is necessary. If this change is implemented on schedule, then 9th grade students who have already signed up for just one semester in health to earn the previously required ½ credit, would then need to potentially add another ½ credit later in their high school years (a course that might, or might not, overlap appropriately with the current health course). Further, we remain concerned about slowly chipping away at the opportunity for students to elect to

⁵ <http://www.marylandpublicschools.org/stateboard/Documents/2020/1207/SBOE-Presentation-High-School-Graduation-Task-Force.pdf>

⁶ The Task Force report also states, incorrectly, that USMD requires “math every year of high school”. USMD requires four credits of high school mathematics and requires students to be enrolled in mathematics in their final year of high school, but does not require enrollment in math every year of high school. While that requirement is not under review here, we believe that the state requirement should be amended to include exceptions for students who begin the high school mathematics sequence in middle school or otherwise meet the USMD breadth requirement in mathematics prior to 12th grade.
<https://www.usmd.edu/regents/bylaws/SectionIII/III400.pdf>
<https://www.usmd.edu/newsroom/news/1021>
<https://admissions.umd.edu/apply/requirements/freshman>

⁷ <http://www.marylandpublicschools.org/stateboard/Documents/2020/1207/SBOE-Presentation-High-School-Graduation-Task-Force.pdf>

⁸ <http://www.marylandpublicschools.org/stateboard/Documents/2020/1207/SBOE-Presentation-High-School-Graduation-Task-Force.pdf>

take courses truly of their own choosing, and the subsequent disincentive for high schools to offer unique courses not required for graduation that take advantage of student interest and staff expertise.

Fourth, we support the change to expand the courses meeting the required one credit in technology education to include courses in computer science and engineering subjects. Not only is there high demand for computer science and engineering exposure in high school, but this would also enable students to have more options for tech education pathways. Even if the State Board does decide to delay the implementation of the graduation requirements, we urge MSDE to implement this flexibility immediately, effective for all high school students.

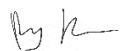
Fifth, we support changes to the assessment requirement so Maryland students no longer have HS graduation subject to a high stakes test. We agree that students should be required to take, but not pass, the required assessments in 2020-21 and 2021-22. However, we are concerned about the plan to have the assessments count as 20% of the students' grade beginning in 2022-23. The mechanics of how this would work leaves our community with concerns about the timing, when assessments would occur, how quickly the grades would be accessible, how one's assessment affects a 2-part course (or in the case of science, up to 6 parts), etc. **We urge the state not promulgate the proposal to have the assessment count for 20% of the course grade and, instead, convene a workgroup that is equally representative of students, parents, teachers, and administrators to discuss and recommend assessment alternatives.** We are not convinced that equity justifications support the particular change proposed for the standalone assessment requirements. Assuming that the Task Force was correct in its finding that passing the standalone assessments has an inequitable impact on students from disadvantaged populations in Maryland high schools,⁹ we did not see the data that show the proposed change won't merely shift the inequitable impact to grades and grade point averages of students from those same disadvantaged populations. We are concerned that students would remain disadvantaged by this policy change.

We appreciate the goal of raising the standards and value of a Maryland public high school diploma, but we are concerned that both the scope of the changes and the speed with which MSDE proposes to implement them will have a negative and inequitable effect on Maryland students as we emerge from the global health crisis that has profoundly affected students' education. Overall, we discourage the State Board from increasing credit requirements for graduation, and we think Maryland public high schools and families need more time before implementing any changes that are adopted.

Sincerely,



Cynthia Simonson
MCCPTA President



Rodney Peele
MCCPTA Vice President for Educational Issues

⁹ <http://www.marylandpublicschools.org/stateboard/Documents/2020/1207/SBOE-Presentation-High-School-Graduation-Task-Force.pdf>

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

To Whom It May Concern,

Thank you for the opportunity to comment on the proposed action on regulations as noted in COMAR 13A.03.02.02—.04, .06—.10, and .12. [<link>](#)

I work as the Assistant Principal of the Career and Technical Education program at the Maryland School for the Deaf. In this role, I oversee the daily operations of our CTE teachers, students, courses, and facilities. My primary responsibility is to serve our deaf and hard of hearing students and to ensure the best possible educational and career opportunities are provided.

The text for this regulation (13A.03.02) includes several regulatory actions that the Maryland State Department of Education should revisit in light of data which suggests that the outcomes of these proposed actions may not achieve the purpose of the regulation.

General data suggests that the actual outcomes of these proposed regulatory actions will become a detriment to our students who have a disability to access enhanced graduation requirements and increased academic rigor that prepares students better for postsecondary and career opportunities.

While MSDE recognizes and addresses the fundamental barriers faced by students with disabilities, the unique lifelong communication obstacles that are faced by students who are deaf or hard of hearing need to be considered. The Maryland School for the Deaf is a public school that provides full, direct access to all students in a bilingual education in American Sign Language (ASL) and English. An ongoing challenge for MSD is partnering with other schools, programs, or organizations that do not provide full access in both languages.

Only a handful of colleges and universities in the US provide full, direct access to students and educators who are deaf or hard of hearing. In the state of Maryland, there is not one postsecondary program that is designed to be completely ASL and English accessible. MSD has worked to expand programming and opportunities available to our students that better prepare them for postsecondary academic opportunities.

Courses such as AP Literature and Composition, Raster and Vector Graphics, Environmental Science and Pre-Calculus are offered in partnership with College Board, Rochester Institute of Technology, and Frederick Community College. The benefits of these courses have been significant for our 11th and 12th grade students who are preparing for college. The proposed text in the regulations, "shall be provided by the local school system or through a Maryland Higher Education Institution as part of Dual Enrollment" would prohibit our ability to work with certain partners and directly impact the students' access to these options that are available to students who are not deaf or hard of hearing.

Revising the text in this regulation to allow special considerations for schools such as MSD who meet criteria for students with disabilities would better meet the stated purpose of this regulation.

Please re-consider the effectiveness of the proposed text in this regulation in achieving its stated purpose.

Sincerely,
Steve Mather
Assistant Principal

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

To Whom It May Concern,

Thank you for the opportunity to comment on the proposed action on regulations as noted in COMAR 13A.03.02.02—.04, .06—.10, and .12. [<link>](#)

I teach the dual-credit course Raster and Vector Graphics to two juniors and three seniors at the Maryland School for the Deaf (MSD) for the school year 2020-2021. This course was designed by Project Fast Forward (PFF) under the aegis of an accredited college, National Technical Institute for the Deaf/Rochester Institute of Technology (NTID/RIT). PFF is a federally-sponsored program made possible by several grants from the National Science Foundation (NSF grant numbers 0602761, 1104229, 1501756). I am also deaf and fluent in both American Sign Language (ASL) and written English.

The text for this regulation (13A.03.02) includes several regulatory actions that the Maryland State Department of Education should revisit considering how these revisions may lead to discriminatory and detrimental results for both deaf/hard of hearing students and teachers.

The number of collegiate STEM programs in Maryland that provide full and *direct* language access for both deaf students and teachers stands at zero. MSD implemented a workaround that allows its teachers to teach college-level courses on its campus in ASL through partnerships with Frederick Community College and NTID/RIT. These partnerships allow for unfettered access to the course content for the deaf and hard of hearing students and they have been critical in creating viable pathways to college-level enrollments for our students. These partnerships are of paramount importance, because these ASL-based classes are reducing barriers for the deaf and hard of hearing. These efforts go a long way in addressing the deaf/hard-of-hearing underrepresentation in the technician workforce.

To illustrate, NTID PFF program's stated goals for the deaf/hard-of-hearing students are to:

- Increase aspirations and motivation to go to college*
- An opportunity to imagine a different future
- Confidence in their ability to succeed in college
- Learn the study skills needed for college-level courses
- Save time and money on a college degree
- Prove to their parents (and to themselves) that they can do college-level work*

(Text is pulled from PFF's program introduction slides. A copy of these slides are available upon request.)

The asterisks are mine. The first and last purposes of this program are the critical points that the proposed regulations will likely impair. In the last four academic years, a total of thirty-nine (39) MSD students took college-level courses at MSD. Every single one of these students went on to enroll in colleges and universities. As a recent example of using this PFF partnership to create pathways to higher education, I have a BIPOC student who is excelling in my course this year and his bolstered confidence led him to apply to Towson University. He has been accepted and he plans to major in their Computer Science program.

Finally, I received training from NTID to teach a college-level course. The teacher preparation program was conducted in ASL, removing the need for ASL interpreters or additional accommodations. Throughout the academic year, I benefited from ongoing support from an assigned PFF official in ASL to ensure that I grow in my ability to teach the college course. As a teacher for deaf/hard of hearing students, I am particularly appreciative that each lesson is uniquely tailored for deaf/hard of hearing students. The present teacher

preparatory opportunities on offer under the Maryland colleges/universities system are not conducted in ASL nor tailored for deaf/hard-of-hearing students, so I would be required to receive training through interpreters and other types of accommodations. My experience reinforces the need to preserve the school partnership opportunities that include specialized training programs.

The proposed text in the regulations, “shall be provided by the local school system or through a Maryland Higher Education Institution as part of Dual Enrollment” would severely derail our ability to create viable college-bound pathways for our students. I strongly urge you to reconsider this approach to preserve the MSD’s ability to maintain partnerships with unique population-specific programs such as PFF to continue its critical work in closing the opportunity gaps and education disparities among the underserved communities.

Sincerely,
Julie Bourne
MSD Teacher

----- Forwarded message -----
From: **Calvin Doudt** <calvin.doudt@msd.edu>
Date: Mon, May 10, 2021 at 2:26 PM
Subject: Public Comment RE: Dual Enrollment
To: <mary.gable@maryland.gov>

Hi Ms. Gable,

My name is Calvin Doudt and I am the High School Assistant Principal at Maryland School for the Deaf, Frederick Campus. I would like to submit a public comment regarding 13A.03.02 Graduation Requirements for Public High Schools in Maryland.

Our students benefit from a partnership with colleges and universities outside of the state of Maryland. In the past, we have partnered with RIT (Rochester Institute of Technology), and with their Project Fast Forward initiative our Deaf and Hard of Hearing students get a jump start on their college journey. This is provided at no cost for all Deaf and Hard of Hearing students and includes full accessibility for both our teachers and students without any language barriers. This is critical for our students since it is an effective way of preparing our students for their post-graduation plans. I ask that you revisit the language related to dual enrollment courses and make a provision that allows deaf students throughout the state to take dual enrollment courses through colleges that have programs for deaf students.

Thank you for listening.

Warm regards,

Calvin D. Doudt
Maryland School for the Deaf - Frederick Campus
High School Principal
101 Clarke Place
Frederick, MD 21703
(240) 575-2971 VP

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101 Clarke Place, P.O. Box 250
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Established 1868



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(410) 696-3080 (Fax)
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Established 1973

May 10, 2021

To whom it may concern,

Thank you for the opportunity to provide comment on 13A.03.02 Graduation Requirements for Public High Schools in Maryland set forth in Education Article, §§18-14-01, Annotated Code of Maryland.

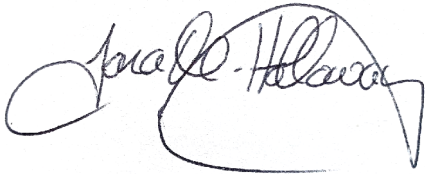
Language included in these regulations limits course options for deaf students only to Maryland institutions of higher education. Our students attend universities and colleges in the state of Maryland as the exception not as the rule, and almost exclusively attend Gallaudet University and Rochester Institute of Technology as they have large populations of deaf students (Gallaudet being the only university solely for Deaf students in the world). For our students to attend a college or university in Maryland would mean our students are linguistically and culturally isolated and therefore are not as motivated to take a dual enrollment course through these institutions. To be able to take a dual-credit/enrollment course from a college they may actually attend is extremely beneficial and motivational, helping to expose students, who may otherwise not attend college or take a dual enrollment course, to college level learning opportunities which then leads to more students pursuing higher education, the ultimate goal.

Specifically The Maryland School for the Deaf wishes to provide dual enrollment courses in partnership with Rochester Institute of Technology (RIT), National Technical Institute for the Deaf (NTID). These courses are offered at no cost to students and are taught by Maryland School for the Deaf teachers who have attended specialized training provided by RIT/NTID as it relates to the curriculum and instruction of these courses. These courses are also specifically focused on STEM skills, a growing field in need of diversity.

We ask that The MSDE ensure that the language set forth in these regulations is equitable by allowing for deaf students across the state of Maryland to take online and dual enrollment courses from colleges and universities outside of the state of Maryland that have programs that serve deaf students.

We would also like The MSDE to review Education Article, §§ 18-14A-01(a)(2), that defines a dually enrolled student as being enrolled in a Maryland secondary school and a Maryland institution of higher education in order to allow a provision for deaf students to take courses from other institutions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tara M. Holloway". The signature is fluid and cursive, with a large initial "T" and "H".

Tara M. Holloway
Director of Curriculum and Instruction
Director of Accreditation
MSDE Liaison
Maryland School for the Deaf

COMAR Changes/Proposed Actions

COMAR 13A.03.02 Graduation Requirements for Public High Schools in Maryland and COMAR 13A.04.01 Programs in Technology Education

Montgomery County Public Schools (MCPS) Comments

BACKGROUND: The Maryland State Board of Education proposes to amend Regulations .02—.04, .06—.10, and .12 under COMAR 13A.03.02 Graduation Requirements for Public High Schools in Maryland and Regulations .01 and .02 under COMAR 13A.04.01 Programs in Technology Education. These actions were considered by the State Board of Education at their January 26, 2021, meeting.

- The recommended amendments to credits, beginning with the ninth grade class of 2021-2022, include an increase in the number of credits required for graduation from 21 to 22, an increase in the number of credits in mathematics from three to four, and an increase in the number of credits in health from one-half credit to one credit.
- Computer Science and Engineering would be added to subject of Technology Education. Advanced Technology would be deleted from the completer options.
- The graduation requirement that students must pass assessments in algebra, English, science, and government would move from a stand-alone assessment requirement to an end-of-course assessment requirement, which would count 20 percent of the student's final grade in the respective course. This requirement would begin in the 2022-2023 school year. Clarification of the assessment requirements for students is included. In the 2020-2021 and 2021-2022 school years, taking the Maryland Comprehensive Assessment in algebra, English, science and government will meet the graduation requirement. Students graduating in the 2020-2021 school year are not required to take the assessment in government.
- Students would be able to earn two State endorsements, which could be added to their diploma including a College Ready State Endorsement and/or a Career and Technical Education State endorsement.
- Amendments include clarification of the requirements and content in science, government, and Computer Science, Engineering, or Technology Education. Language moving from Maryland High School Assessments to the Maryland Comprehensive Assessment Program is corrected throughout the regulation.

MCPS Comments:

Maryland Comprehensive Assessments

There are several implications regarding the end-of-course assessment counting as 20% of the student's final grade in the respective course. These implications are summarized below, in comments and questions that will need to be addressed.

- There will need to be swift turnaround time on the end-of-course assessment results in order factor into 20% of the grade, particularly for seniors.
- For local school systems such as MCPS that award credits in semester (.5) increments, how will the 20% be calculated into the grade? Will it be applied to both semester grades or only the second semester final grade?
- MCPS and other local school systems will need to consider the implications of 20% grade composition on the local accountability system such as the MCPS Evidence of Learning Framework.
- Bridge Projects: Bridge projects are still part of the COMAR regulation for the current assessments. How will they be factored into the process once the assessments become end of course assessments?
- Will students need to retake the assessment at the end of credit recovery or a complete course retake?

- If the student does not pass the course due to the test but otherwise would have passed, must they retake the entire course again?
- If the student had low course grades, but a high assessment score, can they reuse the assessment score for a course retake?
- If the student does not take the EOC assessments, can they still pass the course?
 - When they do take the assessment, will their final grade from the course need to be modified?
- Can students retake the assessment to achieve a passing score for the course or higher grade?

Other Comments

- **Mathematics and Health credits:** The pandemic experience has demonstrated that students benefit from increased flexibility--not only in response to emergency circumstances, but also to provide greater flexibility in a high school student's schedule for dual enrollment, career and technical education, work-based learning, and other experiences. Additional credit requirements inhibit this flexibility.
- **Diploma Endorsements:** MCPS supports a clear designation of Career and Technical Education as a diploma endorsement that reflects a rigorous standard and that a student is ready for post-secondary studies and the workforce. However, in implementation, it will be important to message and brand this endorsement as reflecting a rigorous standard, not the stigma associated with "vocational education" in our past.

COMAR 13A.04.09 Program in Science – Summary of Comment

Submitted by:	Summary of Comments	MSDE Response
<p>Office of Curriculum and Instructional Programs, Montgomery County Public Schools (email dated 5/10/21)</p>	<ul style="list-style-type: none"> • The implementation of the Next Generation Science Standards (NGSS) provides a greater focus on teaching and learning in science and shapes what all students need to know and be able to do to prepare them for the changing world ahead. • MCPS applauds the proposed changes to COMAR which integrate the Maryland Comprehensive Assessment score into the final report card grade for the assessed course; doing so helps to eliminate barriers to high school graduation. However, for a school system such as MCPS, which reports grades in a semester basis, not a full year basis, this will set up significant inequities for students and teachers. 	<p>Logistics regarding course offering and grading will need to be addressed as the MD Comprehensive Assessment in Science is implemented. Guidance will be provided on end-of-course grade calculations.</p>