

February 25, 2019  
Maryland State Board of Education

Dear State Board Members and Ms. Spross,

Baltimore City's *Black Teacher Recruitment and Retention Working Group* writes collectively to raise our concerns and recommendations regarding teacher certification. Education research indicates that the social and academic achievement of Black students increases when they have even a single Black teacher with whom they can identify. However, current state certification requirements place an undue burden on current and prospective Black teachers, and proposed changes to these state certification requirements threaten to maintain or exacerbate this undue burden. Therefore, we ask you to consider our input and the racially inequitable impact of current requirements and proposed changes as you consider your next steps.

Our group includes Baltimore City Public Schools ("City Schools") leaders, teachers, and organizational partners seeking to address the persistent gap in City Schools between the percentage of teachers who are Black (45% today) and the percentage of students who are Black (nearly 80% today). Similar and worse gaps exist across Maryland local educational agencies. A contributing factor in the decline of the number of Black teachers teaching in our schools is systemic racism. Systemic racism forms a barrier to recruitment and retention of Black teachers at every phase, including but not limited to pathways into teaching, certification requirements, mentoring experiences, and working conditions. Since July 2018, we have held monthly, public meetings to explore recruitment and retention practices, challenges, and opportunities.

Challenges with certification top the list of concerns the Working Group has heard since our launch last summer. Given that so few Black teachers graduate annually from Maryland college- and university-based teacher preparation programs, City Schools has relied in part on its discretion to issue conditional certificates to be able to attract and hire Black teachers. This is important context for our concerns and recommendations.

**Current licensure rules set a misleading bar, not a high one, often screening out talented teachers, particularly Black teachers.** Maryland currently requires prospective teachers to pass several standardized tests to earn a teaching certification. This is a well-intentioned effort to ensure that only the most promising teachers make it into the classroom – but there's no evidence that such a rigid, test-based approach to licensure accomplishes this goal. Praxis exams have been shown to have a disproportionate screening effect on Black teacher candidates. For example, data prepared in May 2018 by Educational Testing Service (ETS) showed that Praxis Core pass rates were 23-37% lower among black test takers compared to white test takers in reading and math. Now, proposals include adopting yet another licensure test – such as edTPA or PPAT – but neither has been proven to predict effectiveness or checked for potential racial bias.

In our public working group sessions, we have heard from Black teachers who achieve good outcomes for our students, who are performing at the effective and highly effective levels, who proclaim teaching as a calling, and who intend to stay in the profession in Baltimore. Despite competency and commitment, we have heard repeatedly that arduous certification requirements keep Black teachers out of the profession and makes retention difficult. The Praxis test is of

particular concern and now we have equal concern with respect to the edTPA and the PPAT. Not only do these function as barriers to Black teachers entering the profession but there is only a thin body of work establishing correlation between successful scoring and efficacy in the classroom. The well-debated shortcomings of edTPA consist of a lack of opportunity for feedback, documented bias in observations and a focus on pre-service teachers. These shortcomings would fall particularly hard upon Black teachers.

We understand from our reading and from attending hearings that a central focus of both the Kirwan Commission and MSDE is on creating stricter entrance requirements for teachers. We urge you to consider that this approach fails to acknowledge and address the impacts of systemic racism. We say this not to advocate “lower standards,” but rather to define quality more broadly. There needs to be a value placed not just on high entrance and certification requirements, but also on: long-term commitment to the community, ability to relate to and incorporate into their teaching the students’ backgrounds and historical context (cultural competency), adherence to principles of racial justice, and student mentoring capacity. When teachers – particularly Black teachers – are in short supply and can choose where they teach, we need to be wary of creating barriers to certification. At the same time, we must acknowledge the importance of the significant cohort of conditionally certified teachers we hire every year, and must make both the requirements for professional certification and the support required to get there a much more considered part of the recommendations. This is not a second-class group, but rather a vital part of our teacher supply.

While the program design for the Massachusetts Class Measures program has some good elements, and while we agree that the current requirements for conditionally certified teachers to become professionally certified leave a lot to be desired, we feel that the Massachusetts program does not address the unique challenges facing various districts in Maryland. We have a chronic shortage of teachers in Maryland, and particularly in Baltimore City. Massachusetts hires 94% of its teachers from within the state compared to 54% for Maryland. We have a very urgent need to bring more quality teachers to our least well served schools.

One aspect of increasing teacher “quality” is the ability for districts to retain their new teachers long enough to a) warrant the investment of time and money spent in recruitment, coursework, and mentoring, and b) achieve a level of teaching proficiency that adequately serves the needs of our students. The bottom line for this pathway to full licensure is that it must, on balance, bring more and better qualified teachers to our hardest to staff districts. We need to increase the programmatic supports, mentoring, and access to appropriate coursework provided to conditionally certified teachers so they are up to par with teachers from other pathways. This need is addressed, in part, in your recommendations under the *Performance Review Option*. However, in general, your recommendations under this section add to burden on these teachers, fail to address the barriers to program completion, and will likely result in fewer high quality teachers in our schools.

Most importantly, the requirement for these teachers to complete 120 hours of education related coursework represents a huge increase over current standards and places an arduous and unnecessary burden, and therefore added deterrent, on a set of teachers we specifically want to recruit and retain. This requirement belies the term “Performance Review.” As far as we can tell

from the attachments provided in the board minutes, the Temporary Teaching Permit in Pennsylvania requires only 6 course hours of seminars and workshops, and 6 course hours of graduate level pedagogy coursework. Our suggestion is that the Maryland requirement be amended to the following:

- Performance Review Option candidates complete an approved PRO program as part of a cohort. The approved PRO programs should be required to tailor their coursework requirements to the individual teacher in each cohort, and the total of required coursework hours should not exceed 30 if taken at the Masters level, or 45 if taken at the undergraduate level. The PRO program should include at least 12 hours of standard coursework taken by all participants.

With regard to supports needed to reduce barriers to program completion, we recommend that attached to the recommendation for the *Performance Review Option* there be **dedicated state funding** for districts to provide:

- **Upfront (as opposed to reimbursement-based) tuition support for coursework**, as long as timely progress is made toward professional certification, and provided the teachers receive effective or highly effective evaluation ratings. Teachers who can least afford to pay upfront for college credits should not be prevented from pursuing this career.
- **Release-time or dedicated full-time mentors** for all conditionally certified teachers (providing, that after the first year, they get a recommendation from the principal). We agree that the support for conditionally certified teachers should be extended over a five-year period in order to allow ample time for completion of requirements, but teachers who meet the requirements sooner, should be eligible for professional certification.
- **Additional, targeted and personalized customer service** related to certification by local educational agency staff.

We believe that this approach will provide a balanced message to teachers, to schools, and to parents in our city that we are actively seeking to find a balance in how we entice and retain teachers from diverse backgrounds.

Our suggestions listed above are only part of a fuller response to your recommendations. We are concerned that, given the time constraints, we needed to at the very least alert you to our deep concerns about the added burdens of the *Performance Review Option* as currently proposed.

Black Teacher Recruitment & Retention Working Group  
Baltimore City  
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Maryland State Board of Education

Public comments

February 26, 2019

Good morning.

My name is Julie Miller-Breetz and I currently serve as the chairperson for the Citizens Advisory Committee for Gifted and Talented Education in Baltimore County and I am here today to speak on the proposed revisions to COMAR 13A.04.07.

I spoke before this board two and a half years ago, concerned about the state of gifted and talented education in Maryland and believing that the problem likely originated in the gifted and talented education policies that local school districts were, or weren't, putting into place – coupled with a state regulation that provided little real guidance.

The beauty of the Annotated Code of Maryland and COMAR is that they are not mere suggestions but that they carry the weight of law. Removing the “shall consider” language in certain provisions with “shall” provides enforceable requirements that stakeholders across the state are looking for. Having just gone through an extended effort on the revision to Baltimore County policy and rule on gifted and talented identification, programs, and services, we recognize more strongly than ever the importance of the guiding COMAR regulations for accountability and reliability at the local school district level.

It is this desire for increased accountability that also makes us very pleased with the stronger language in the monitoring and reporting requirements section of the draft revision. Effective only this year does Baltimore County have in its policy the requirement that the Superintendent provide to the Board disaggregated data related to advanced academics students. Being able to access state data, may, for some local school districts, be the only data they have on gifted and talented students in their district. Therefore, we support the addition of a state code for gifted and talented in annual reports to support implementation of section 06.B.2, as this would allow districts to follow academic progress over time, use data to inform program evaluation, and make revisions for continuous improvement while also providing a window for

stakeholders to gain some understanding of how gifted and talented education is working in particular districts and across the state.

In the same accountability vein, we are concerned that the current wording of section .02.F(2) would allow districts to opt out of the identification requirements in section .02 that precede part F. State mandated achievement tests are not designed to identify gifted learning behaviors and aptitudes, most particularly among diverse, underrepresented populations in gifted programs. This would nullify the requirement for equitable identification.

Finally, in reference to .02D, we are aware that some believe that rather than requiring identification of at least 10% of students in every school, the requirement should rather be identification of 10% in each school district. We are divided on this issue, see the pros and the cons, and understand the arguments on both sides. If the decision is made to use local norms in this process, this will be a large-scale change that will require a lot of education and communication with stakeholders throughout the state.

Thank you for your time,

Julie Miller-Breetz

LAUREL HIGH SCHOOL				
TESTING CALENDAR 2018-2019				
ASSESSMENT	TESTING DATE	CONTACT	LMC USED	SUBJECT ASSESSED
<b>SEPTEMBER</b>				
SLO - PRE-TEST	SEPT 4 - OCT 12 **			All classes
MAP GROWTH	SEPT 10-21 MAKE UP 24-27			9/10 English
ACCUPLACER	SEPT 17-28			11/12 Qualify for Dual Enrollment
<b>OCTOBER</b>				
PSAT	Oct 10	Mrs. Collins-Swain		10 graders, registered 9/11
ASVAB	Oct 24	Dr. Harris		Armed Services
SLO - Pre-Test continue	SEPT 4 - OCT 12			All classes
Maryland State Survey	Oct 8 - Nov 9			9th, 10th, 11th
<b>NOVEMBER</b>				
FAST #1 - Government	NOV 7 - NOV 30			Government - LSN
FAST #1 - Science	NOV 7 - NOV 30			Science -
MATH QUARTERLY BENCHMARK	NOV 7 - NOV 30			
STUDENT PERCEPTION SURVEY	NOV 7 - DEC 14			
PARCC	NOV 27 - JAN 16			English, Algebra, Geometry
<b>DECEMBER</b>				
STUDENT SURVEY, continue	NOV 7 - DEC 14			
PARCC continue	NOV 26 - JAN 15			Senior/Retake
<b>JANUARY</b>				
MAP GROWTH - English	JAN 2 - 16 MAKE UP JAN 17-23			9/10 English
SLO POSTTEST	JAN 2 - FEB 13			All classes
PARCC - Algebra/English, continue	NOV 26 - JAN 15		YES	Alg 1, Alg2 / Eng10, Eng11
HSA - Government	JAN 7 - FEB 1		YES	LSN
MISA - Science	JAN 7 - FEB 1		YES	Biology
ACCESS - ELL	JAN 7 - FEB 8 MAKE UP FEB 11 - FEB 22			English Language Learners
FAST #2 - Government	JAN 29 - FEB 15			Government, LSN
FAST #2 - SCIENCE	JAN 29 - FEB 15			Science - Biology
MATH QUARTERLY BENCHMARK				ALG 1 and 2, Geometry
<b>FEBRUARY</b>				
FAST #2 - Government	JAN 29 - FEB 15 MAKE UP FEB 19-22			Government, LSN
FAST #2 - SCIENCE	JAN 29 - FEB 15			Science - Biology
MATH QUARTERLY BENCHMARK				ALG 1 and 2, Geometry
ACCUPLACER	FEB 19 - MAR 4			11/12 Qualify for Dual Enrollment
SLO POSTTEST	JAN 2 - FEB 13			All classes
ACCESS - ELL continue	JAN 7 - FEB 8 MAKE UP FEB 11 - FEB 22			English Language Learners
MARYLAND SURVEY	Feb 25			
<b>MARCH</b>				
ACCUPLACER, continue	FEB 19 - MAR 4			11/12 Qualify for Dual Enrollment
SAT	March 6			11 graders
<b>APRIL</b>				
PARCC - Algebra/English	APR 8 - MAY 17			Alg 1, Alg2 / Eng10, Eng11
<b>MAY</b>				
IB ** SEE IB TAB BELOW FOR DETAILS*	MAY 7 - MAY 23	Mr. Diewald		IB students
AP	MAY 6 - MAY 17	Mrs. Collins-Swain		AP students
MISA - Science	MAY 7 - JUNE 7		YES	Biology
HSA - Government	MAY 7 - JUNE 7		YES	Government, LSN
PARCC - Algebra/English, continue	APR 8 - MAY 17		YES	Alg 1, Alg2 / Eng10, Eng11
MAP GROWTH - English	MAY 13 - MAY 24 MAKE UP - MAY 28 - 31			9/10 English
ACCUPLACER - FINANCIAL ALGEBRA STUDENTS ONLY	MAY 28 - JUN 7			11/12 Qualify for Dual Enrollment
<b>JUNE</b>				
MISA - Science, continue	MAY 7 - JUNE 7		YES	Science
HSA - Government, continue	MAY 7 - JUNE 7		YES	Government
ACCUPLACER - FINANCIAL ALGEBRA STUDENTS ONLY, continue	MAY 28 - JUN 7			11/12 Qualify for Dual Enrollment

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## **Rigorous Teacher Licensing Tests Needed**

**By Jerome Dancis, Ph.D. (math)**

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My children brought home test papers with Mathematically correct answers marked wrong! This occurred at Blue Ribbon schools in Maryland, which were receiving National honors from Pres. George Bush. One teacher was the lead Math teacher at her school.

My colleagues in the Math Dept. at Univ. of MD informed me that Mathematically correct answers being marked wrong, was not unusual.

The Praxis II content exams are used to certify teachers. In the last decade, I read all the sample questions on the Praxis II "Middle School math test" website. Not only will qualified applicants pass this exam, but also applicants, whose knowledge of arithmetic is lower than that of a well-trained sixth grade student.

My Grade 5 class in Brooklyn, New York City regularly solved Arithmetic word problems that were conceptually more difficult than the Arithmetic word problems listed in the Praxis II Sample Questions.

The Singapore Grade 6 Math books as well as the Math SAT have Arithmetic word problems that are conceptually more difficult than the ones listed in the Praxis II Sample Questions for teachers.

To raise Maryland students' scores on Math SAT, I recommend including Math SAT Arithmetic word problems in the middle school Math syllabi and using a rigorous licensing test, which ensures that future middle school Math teachers will be fluent doing the Math SAT's Arithmetic word problems.

National Board Certification is mainly concerned with pedagogy.

Obtaining National Board Certification will not require that a teacher be an expert in the content.

Being an expert in the content is not a requirement to become a lead teacher.

\* I will be pleasantly surprised if requiring the National Board Certification process will reduce the number of times that Mathematically correct answers are marked wrong.

\* The state's content experts on Math, science, history and English are in the academic departments of the Univ. of MD. I suggest that the board ask Univ. of MD Math, science, history and English departments to evaluate the content assessments used for licensing tests.

\* AP Calculus is far more sophisticated than honors Pre-Calculus. There should be one high school math teacher certification for math thru Pre-Calculus and an AP Calculus teacher certification for high school math and AP Calculus.

**\*\* Our children deserve teachers who are fluent in the content. The big increment in salaries will allow the board to demand rigorous licensing tests.**