

September 24, 2024

Good morning, President Michael, Vice President Goldson, Superintendent Wright, and members of the State Board of Education,

My name is Nikki Woodward, and I am an early intervention infant and toddler specialist for vision/visual perceptual disabilities or developmental delays educator and vice president of the Maryland State Education Association. I am submitting this testimony on behalf of MSEA's nearly 75,000 members to provide feedback on version three of MSDE's proposed literacy policy.

PAUL LEMLE
President

NIKKI WOODWARD
Vice President

COLLEEN MORRIS
Treasurer

SEAN JOHNSON
Executive Director

The department and board's iterative approach to refining this policy for the benefit of students, families, and educators is commendable. The most recent version takes into consideration much of the feedback stakeholders have raised, including our feedback on parent involvement in the student reading improvement plan, retention as a last resort, a reading intervention program that occurs during the school day, and acknowledges that some students have not yet been identified as having a disability. Nevertheless, several crucial concerns remain unaddressed, warranting our continued advocacy.

As previously mentioned, we want to emphasize our support of the literacy policy as a strategy to address learning gaps. The COVID-19 pandemic and historical inequities in education have exacerbated the challenges reflected in our students' most recent NAEP and MCAP scores. However, in order to sustain academic improvement for our students, we have to diligently implement solutions that consider a myriad of factors and do not fall short of uplifting the work that has already begun due to the Blueprint for Maryland's Future law. In our attempt to provide recommendations to bolster this policy, we have contemplated a diverse set of solutions that we believe will offer positive long-term outcomes for those impacted by this policy.

Our previous recommendations to this board included deferring the implementation's timeline, considering educators' workloads, focusing on equity, and promoting transparency. In sum, our recommendations centered on equity, families, students, and educators. We hope our continued emphasis on these recommendations will produce a robust version four that we, and the more than 1,000 stakeholders you heard from, can boldly support.

Implementation Timeline Deferral

The updated timeline will help stakeholders understand how each aspect of this policy will be implemented. There are, however, some contradictory explanations of the timeline. For example, section D(4)(b)(ii) notes that a student who does not demonstrate reading proficiency will receive a notification that includes "a summary of all parent notification related to reading difficulties and any interventions implemented in grades K through 3 according to the student's SRIP." MSDE's proposed timeline precludes a comprehensive summary of interventions across the specified grade span. **This is why our recommendation remains to delay implementation until the 2028-2029 school year.**

This reconfigured timeline would allow for sufficient training of educators and families on new curriculum, pedagogy, and academic requirements. Additionally, it would provide a more complete illustration and comprehensive data of intervention supports offered to students over several years.

Again, our recommended timeline takes into consideration the time needed to fully develop and assess necessary support systems before retention begins. As stated in the policy, we agree that this school year (24-25) should remain devoted to offering training/coaching supports, technical assistance, and professional learning for educators and administrators, as well as introducing families and students to the new policy. School years 25-26 and 26-27 should be used to monitor the progress of the universal screeners and the implementation of the science of reading curriculum. **By school year 28-29, a student who began their college and/or career journey in kindergarten would be in the third grade, and MSDE and LEAs would have sound cohort data to observe the effectiveness and hopeful success of the implemented strategies.**

This approach honors the goal of ensuring all students are reading at grade level by the end of third grade via a meticulous implementation timeline.

Lastly, it was helpful for MSDE to make references to the regulations and statutes that support this policy. We'd like to elevate one of these, the Ready to Read Act and its corresponding regulation (COMAR 13A.03.08) that allows 30 calendar days for parent notification. It would be helpful for the department and board to clarify if the subsequent 15-day written notification is after the 30 calendar day period. A timeline that alters the reporting/notification window from 30 calendar days, as noted in regulations, to 15 days, as seemingly noted in the policy, would not only be unrealistic but overly burdensome. We hope this board's aim is to introduce feasible timelines to support fruitful implementation.

Our proposed implementation timeline would allow ample time for interventions and support, potentially mitigating the need for retention and alleviating concerns about increased class sizes.

Workload

From our analysis of this policy, we still believe there to be potential workload concerns. Not only does there seem to be potential workload concerns for educators, but that of MSDE in offering the several layers of support needed for successful implementation. While educators are enthusiastic about excelling in this endeavor, we must prioritize their well-being throughout the process.

Earlier this month, the AIB heard from the MILE Center, which will also present to the Board today. While the research from MILE noted pointed improvements and statewide dedication to literacy proficiency, it also highlighted challenge areas that echo our concerns around the timeline and are interlaced with educator workload. Some challenges noted included a lack of sustained and consistent training, lack of time for implementing interventions, inaccessible or inconsistent communication with families, and challenges with providing tiered intervention due to personnel

and training.

The MILE Center also noted to the AIB, and will likely share with you, that educators are using their own financial resources to spur the work of the science of reading. We know how resolute our educators are in the work to support students, and we should allow them to demonstrate this compassion, care, and commitment without burdening them with a rushed timeline that increases their workload and indirectly obligates them to supplement requirements with their own funds.

Version four makes it markedly easy to understand the roles and responsibilities of many of the actors affected by this policy. It would be helpful to consider, as an exercise, the responsibilities of educators as a result of this policy to observe how it creates an increased workload further. Consider the “Read at Home” program, for example. The policy notes that the onus is on the district to provide this program; however, it **fails to consider/note what will be required of educators to ensure this program is administered with fidelity.**

Additionally, we continue to emphasize the need for this policy to not impede statutorily mandated instructional time and to protect collective bargaining practices regarding compensation. Many sections of this policy reference “before and/or after school supplemental intervention delivered by a teacher,” and we want to ensure this body considers how educators will be compensated should this occur.

Finally, we continue to seek clarification regarding the licensure renewal process for educators needing to satisfy new science of reading requirements as a result of this policy. **The literacy policy still has conflicting messaging around what educators need to do and when to successfully renew their licenses. It is our recommendation that the department address this concern plainly in the final version of this policy.**

Equity and Transparency

The updated version of this policy will make greater strides in terms of equity and transparency. **We were glad to see the addition of informing parents about the risks and benefits of retention and greater autonomy given to parents about consenting to retention.** We also applaud the department for putting the onus on the school to ensure that effective communication occurs between families and schools concerning retention so that they can make the best-informed decision possible.

Furthermore, we still have concerns about parents' access to resources to implement robust intervention strategies at home. We know that there exist issues of trust between low-income families and school systems, as well as limited time to sufficiently support students after school. Parents with greater affluence and resources are more likely to succeed with home-based programs, potentially widening academic and progress gaps. As previously mentioned, **without clear guidance on accountability and tracking, there is a risk that these programs may not be consistently implemented or monitored across different schools**

and districts, potentially leading to further inequities in student support and outcomes.

We continually encourage the department and this board to **make this process fully transparent, make the final policy easily accessible, and successfully implement it by ensuring the requirements are clearly understood by all impacted.**

With significant funding from the IBIS Group and federal funding to support literacy initiatives in the state, we hope that we maintain the integrity of Blueprint funds as we implement this policy. Generally, our emphasis on these recommendations ensures that we are not providing students with one-size-fits-all approaches in favor of individualized plans that address each student's unique needs.

Thank you for making progress in this important area and for reflecting on several educators' implementation concerns. We remain committed to collaborative efforts in pursuit of our shared goal: ensuring equitable learning opportunities for all students as we close the literacy achievement gap.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nikki Woodward', with a stylized flourish at the end.

Nikki Woodward
MSEA Vice President

cc: Zach Hands, State Board Executive Director
Alex Reese, MSDE Chief of Staff
Rachel McCusker, Board member, Policy Committee Chair