**Factual and Policy Basis**

**And**

**Summary of Comments/Responses**

Department of Education

Chapter 132 Learning Results: Parameters for Essential Instruction

**Factual and Policy Basis:**

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| This amended rule is the culmination of the periodic review of three of the content areas of the Maine Learning Results: career and education development, English language arts, and mathematics. The career and education development, English language arts, and mathematics standards have been reformatted into the Department’s newly-designed Maine Learning Results structure. As each content standard is revised it will be reformatted into this structure to ensure consistency across content areas. This structure divides each content area’s standards into three stages of development: childhood, pre-adolescence, and adolescence. Within these stages, the Department has also identified the associated grade levels: elementary, middle, and high school. Additionally, the Department has standardized the following three descriptors, so that they are consistent across the content areas:Strand: A body of knowledge in a content area identified by a simple title.Standard: Enduring understandings and skills that students can apply and transfer to contexts that are new to the student.Performance Expectation: Building blocks to the standard and measurable articulations of what the student understands and can do.The process for the review and revision of the standards consisted of the following steps:* A public comment period began on November 1st, 2018 and ended December 1st, 2018. In addition, the Department held a public hearing in in Augusta on November 7th, 2018. This public comment period sought feedback regarding the existing standards to ensure that the revision process would address the areas of the standards the public believed were problematic.
* Once the comment period ended, the Department convened a steering committee with representation from a variety of grade levels, roles in education (teachers, administrators, higher education, and non-profit organizations), areas of expertise across the content area, and geographic region. This group closely reviewed the existing standards and public comments and provided recommendations as to the types of revisions to be made.
* The Department reviewed and approved the recommendations of the steering committee and convened a writing team comprised of current and retired teachers from appropriate content areas. During July and August of 2019, the Department facilitated the writing teams’ work. In August, the writing teams submitted drafts to the Department for review. The Department reviewed drafts and chose to adopt the writing team’s recommendations in promulgating the amendments to this rule.

The proposed **Career and Education Development** standards have been renamed, Life and Career Ready Standards. They build upon the implicit intent of the 2007 Career and Education Development Standards and explicitly articulate the interdependent relationships among the knowledge, skills, and attitudes of career development, academic learning, and the Maine Learning Results Guiding Principles. The standards articulate the symbiotic relationship among self-knowledge, self-management, aspirations, career awareness, planning and adaptability in ever-evolving life and career environments. The performance expectations within the Life and Career Ready standards are articulated in developmental progressions that reveal changes in the complexity of what a student can do in contexts that shift from classroom, to school, to local community, to global community all designed to lead to fluid expression of conceptual understandings and skill sets needed for post high school opportunities. The proposed **English Language Arts** (ELA) standards have been revised to be streamlined and direct, reflecting the essential learning for ELA/literacy development. The standards are written in teacher-friendly language and maintain the four strands currently found in the Common Core State Standards: reading, writing, speaking & listening, and language. The proposed language standards remain mostly unchanged. The proposed speaking and listening standards are condensed from six standards to four. The proposed reading standards have been significantly reorganized. Three *foundational skills* standards have been moved to the beginning of the reading strand with expectations for continued support of foundational skills throughout the literacy progressions. Three standards remain for *key ideas and details* and for *craft and structure* but are expressed as essential concepts for literacy development. These essential concepts are no longer articulated in separate standards for literature, informational, history/social studies, or science/technical texts. The text-specific details will move to guidance and support instead of remaining as separate grade-specific performance expectations. Three standards for *integration of knowledge and ideas* are combined to reflect to primary areas of study for this category of literacy development. One standard for range of reading and level of text complexity has been moved to the reading preamble, a statement of overall intention for the development of reading skills. The final reading standard is the fourth foundational standard and addresses fluency as an expectation for K-12 development The proposed writing standards represent the greatest change to the document and reflect the most critical aspects of developing strong writing skills. Ten standards have been reduced to three: *inquiry to build and present knowledge*, *process and production*, and c*omposing for audience and purpose*. *Range of writing*, like reading, becomes a component of the strand preamble and articulates the expectations for writing development. The standards for *text types and purposes* move to guidance and support to provide teachers more flexibility in developing a variety of writing forms. The *process and production* standard incorporates the development of digital literacies and evolving use of technology. *Composing for audience and purpose* also reflects the development of digital literacy and wide variety of writing, composing, collaborating, and publishing opportunities presented to students today. The proposed writing standards do not articulate separate expectations for content writing development. The proposed **Mathematics** standards have made minor adjustments to previous language. The 8 mathematical practice standards were not changed during the reformatting but have been connected to the guiding principles.The previous structure of the Mathematics standards had grade level/grade spans, domains, cluster titles, content standards, and mathematical practice standards. The reformatting of the standards resulted in relabeling the structure to reflect grade level/grade span, strand, standard, performance expectations, and guiding principles/mathematical practice standards.Through this reformatting the writing team was able to reduce the number of standards and to articulate the vertical progression of learning within and across grade levels/spans.  |

**Comments and Responses:**

A public hearing on the proposed amendments to Chapter 132 was held from 1-4 p.m. on November 13th, 2019. At the hearing, one comment was made on the proposed rule.

The deadline for submission of written comments wasNovember 27th, 2019. 13 sets of written comments were submitted by that date. Written comments were received from the following:

1. Andrea Levinsky, Portland High School
2. Jim Peacock, Peak Careers
3. Steffany Tribou, RSU #13
4. Mary Paine, KIDS RSU 2
5. Katie Naude, Belfast Area High School
6. Heidi Early-Hersey, RSU 35/ MSAD 60
7. Dylan B. Dryer, University of Maine
8. Cristina Perez, MSAD 37
9. Kate Greeley
10. Robyn Graziano, Maranacook Community High School
11. Glen Widmer, RSU 71
12. Barbara Bell, Deb Downing, Charlie Franklin, Michael Hayashida, Jen Williamson, Poland Regional High School
13. Ruth Kermish-Allen, Ph.D., Executive Director, Maine Mathematics and Science Alliance

**CAREER AND LIFE EDUCATION COMMENTS:**

1. **Comment (#1):** Commenter shares that “they look good to me.”

**Response:** Thank you for your comment. *No change was made as a result of this comment.*

1. **Comment (#1):** Commenter seeks clarification of what it means to “Demonstrate an awareness of the influence of future educational opportunities and experiences,” and wonders if it means that “if you have a certain educational experience/opportunity what you can do with that opportunity? Perhaps impact might be a better word instead of influence?”

**Response:** We have clarified the language of the adolescence performance expectation C2.d to articulate more clearly the expectation for students to examine and be informed by changing career and economic trends as they plan and choose learning experiences/courses/classes to strengthen their knowledge and skills for what they will need in their next steps after high school.

1. **Comment (#2):** Commenter suggests that we “might think about connecting skills to jobs.”

**Response:** We have clarified the language of Standard C2 Career Awareness and Adaptability and its early adolescence and adolescence performance expectations to capture the relationship among aptitude, interests, and the skills required by the jobs and occupations within career clusters.

1. **Comment (#2):** Commenter suggests “having math teachers bring in career speakers that use math in their jobs and English teachers bringing in people who communicate via writing in their jobs.”

**Response:** There is an important distinction to be made between standards and curriculum. Standards are endpoints: expectations of what students should know and be able to do. A curriculum is the day-to-day lessons and plans that teachers use to assist students in meeting these expectations. School administrative units are responsible for developing and adopting a curriculum that meet the needs of students. How the standards and performance expectations are implemented is in the hands of local educators and subsequent school boards. *No change was made as a result of this comment.*

1. **Comment (#2):** Commenter suggests “being aware of all the various career pathways from apprenticeships, diplomas, certificates, associate degrees, bachelor degrees, and advanced degrees. Finding a way to “honor all career pathways” as early as we can.”

**Response:** The proposed Life and Career Ready standards express a dynamic approach that frame multiple paths for students as they progress through grades K-12 and begin their post high school journey. The performance expectations were specifically written to be demonstrated in any career pathway. In addition, the adolescence performance expectation C2.c states explicitly the expectation to explore credentialing requirements and intentionally leaves space for the growing variety of options for credentials of value. *No change was made as a result of this comment.*

1. **Comment (#2):** Commenter shares, “otherwise, looks like great work so far.”

**Response:** *No change was made as a result of this comment.*

1. **Comment (#3):** Commenter shared that she was “pleased with the Career and Education Development language as a whole. I see social and emotional learning explicitly woven into the self-knowledge piece, and I look forward to establishing a K-12 framework for this in our district.  Our school counselors are already poised to support this effort.”

**Response:** The Maine DOE looks forward to supporting school counselors, classroom teachers, curriculum coordinators, administrators, and superintendents in phasing-in the implementation of the revised standards once the standards are adopted.*No change was made as a result of this comment.*

**MATHEMATICS COMMENTS:**

1. **Comment (#3):** Commenter was pleased to see the Common Core reference in the Mathematics revision.

**Response:** Thank you for your comment. *No change was made as a result of this comment.*

1. **Comment (#9):** Commenter wanted to see more consolidation of the standards.

**Response:** The writing team worked very diligently to consolidate the overall number of standards where most appropriate. This work resulted in the overall number of standards being decreased from 410 standards with 55 extension standards (or + standards) to 97 standards with 12 extension standards (or + standards). We feel this significant consolidation was appropriate for this revision. *No change was made as a result of this comment.*

1. **Comment (#9):** Commenter shared, “I think at the elementary level we would be better off taking the data and measurement strand out and placing those CCSS performance expectations into the NBT and OA strands; so that the real focus is on building number sense and operations, and then using data and measurement as a way to get there.  Just have three major strands at the elementary level: NBT [Number and Operations in Base Ten], OA [Operations and Algebraic Thinking] and GEO [Geometry]. Introduce the additional strands in 6-12.”

**Response:**  The writing committee carefully considered each strand in the mathematics standards looking at the progression of learning from childhood learning standards to adolescence level standards. By including Data and Measurement in the Statistical Reasoning Strand, the committee felt the importance of articulating and making visible the progression of foundational skills. Some schools may choose to teach the Data and Measurement standards as part of Number and Operations in Base Ten, Operations and Algebraic Thinking, and/or Geometry, which is a curricular decision that is made at the local level. *No change was made as a result of this comment.*

1. **Comment (#9 & #10):** Suggestions for formatting, notation, and typos were expressed.

**Response:** The document has been updated for formatting, notation, and typos.

1. **Comment (#11):** Commenter made note of the importance of professional development and supporting documentation for educators, specifically in rural and underserved communities.

**Response:** When the revised standards are approved, Maine DOE will work with teachers to develop and publish information and materials to support implementation. Much of what you request already exists and will be published as part of an appendix or toolkit for implementation. Maine DOE will provide statewide professional development opportunities to support implementation efforts. *No change was made as a result of this comment.*

1. **Comment (#12):** Commenter made note of the importance of “a shared mathematical experience for perhaps the first two years of high school where students learn algebra, functions, geometry, statistics and probability”, as well as a concern for the relevance of Algebra 2 topics for all students.

**Response:** The writing team carefully considered the impact of identifying additional standards as + by looking at the Coherence Map, as well as referencing NCTM’s *Catalyzing Change* book, to determine the impact on related standards within and across topics in the high school standards. After much discussion, the committee felt it was appropriate for all students to have a deep and thorough knowledge and understanding of linear and quadratic functions and used this decision to help identify the standards to be marked with the + designation. The writing team recognized that some of the topics related to quadratic functions may raise some concerns but felt that this set of knowledge and understanding was appropriate for high school. *No change was made as a result of this comment.*

1. **Comment (#13):** Commenter expressed several areas where teachers may need additional support such as:
* Interpretations of Mathematical Practices
* Cross strand connections
* Structure of the standards
* Integration of footnotes

**Response:** When the revised standards are approved, Maine DOE will work with teachers to develop and publish information and materials to support implementation. Much of what you request already exists and will be published as part of an appendix or toolkit for implementation. *No change was made as a result of this comment.*

1. **Comment (#13):** “Making so few changes may be a missed opportunity [in the middle school standards].”

**Response:** The writing team worked closely to ensure a smooth transition between elementary, middle, and high school standards. In the process of doing this work it became clear minimal changes were needed at the middle school level. *No change was made as a result of this comment.*

1. **Comment (#13):** “The steering committee recommended additional (+) designation as appropriate. The revised standards include additional (+) which will allow for more depth over breadth!”

**Response:** Thank you for your comment. *No change was made as a result of this comment.*

**ENGLISH LANGUAGE ARTS COMMENTS:**

* + - 1. **Comment (#3)**: Commenter would like codes provided to demonstrate relationship of proposed standards to current standards.

**Response:** Once the revised standards are approved, Maine DOE will work with teachers to develop and publish materials to support implementation including an explanation of the changes from the original Common Core State Standards and this revision.  *No change was made as a result of this comment.*

* + - 1. **Comment (#3**): Commenter is concerned that by eliminating the three modes of writing in the standards, teachers will not teach the modes of writing.

**Response:** The writing committee carefully considered the weight of standards in rule. The specific elements of the various modes of writing will be moved into a supporting document such as an appendix as guidance for writing instruction. The writing team felt this would give teachers more flexibility in teaching strategies to meet student needs. *No change was made as a result of this comment.*

* + - 1. **Comment (#4):** Commenter commends the writing team for simplifying the writing standards and placing the focus on the skills of composition rather than on the modes of writing. The changes will result in teaching and learning that is less about tasks and procedural knowledge and more about composing and conceptual understanding. Likewise, the proposed writing standards will inform state assessment tasks that are more conceptual than procedural.

**Response:** Thank you for your comment. *No change was made as a result of this comment.*

* + - 1. **Comment (#4)**: Commenter suggests removing the reference to plagiarism from the Writing Standard 3 language.

**Response:** The phrase “while avoiding plagiarism” has been moved to writing anchor standard #1 as the performance indicators referencing citation and research better align to measures that avoid plagiarism.

1. **Comment (#4)**: Commenter suggests that “For Standard 2, include "trying a new approach" in all grade spans. Trying a new approach in writing is what gives young writers a sense of the power (and joy) of language and should be cultivated from the earliest years.”

**Response:** Trying a new approach is an idea that has been noted and may be incorporated into guidance for the implementation of the standards. *No change was made as a result of this comment.*

1. **Comment (#4)**: Commenter states that the repeated language copied below is awkwardly written. Suggested revision:  pieces with introductions~~,~~ and bodies that include~~ing~~ details and conclusions.

**Response:** The document has been corrected by replacing a period with the word *and*.

1. **Comment (#5):** Commenter notes a number of basic formatting issues in the draft.

**Response:** Formatting issues have been resolved.

1. **Comment (#5):**Commenter is concerned that although there are fewer standards in this revision, there are still too many standards in the revised document.

**Response:** The proposed standards were developed by combining similar topics or skills to represent essential learning of conceptual understandings. The revised standards represent linked or grouped learning targets. The committees considered how best to address the reduction of standards while keeping the standards integrity for Maine students. *No change was made as a result of this comment.*

1. **Comment (#5):**Commenter is questioning the purpose of the performance expectations.

**Response:** All of the Maine Learning Results have the same definition of performance expectations. Performance expectations are the “building blocks to the standard and measurable articulations of what the student understands and can do.” The standards are written in a format that is the same across all topic areas. *No change was made as a result of this comment.*

1. **Comment (#5):** Commenter suggests cutting “including point of view, reasoning, and use of evidence and rhetoric” from standard #2 as being too specific and eliminating standard #4 entirely as it appears to be redundant.

**Response:** The writing team discussed this topic extensively and explored the various ways that standards occasionally overlap. The committee determined that it is sometimes necessary for clarity, such as with speaking and listening standard #4, to repeat some language and make cross-strand connections explicit. *No change was made as a result of this comment.*

1. **Comment (#5):** Commenter suggests that the definition of text **as** “words, images, objects, sounds, and symbols that convey messages from developers to consumers” is not consistently referenced in the performance indicators.

**Response:** The writing team discussed definition of “text” extensively and considered the various forms of text in relation to 21st Century literacies. Deeper understanding of various forms of text including media will be supported with resources for implementation and professional learning. *No change was made as a result of this comment.*

1. **Comment (#5):** Commenter wonders about the state requirement for standards as related to graduation. “The Maine Learning results must be taught and students must have the opportunity - 4 years to graduation.”

### Response: Title 20-A §4722. High school diploma standards states a minimal instructional requirement of 4 years or the equivalent in standards achievement for English Language Arts. Local districts can determine the appropriate pathway to meet this requirement. *No change was made as a result of this comment.*

1. **Comment (#5):** Commenter is requesting a *standards at a glance* document.

**Response:** Multiple resources will be provided to support implementation. No change was made as a result of this comment.

1. **Comment (#6):** Commenter prefers the Common Core State Standards as opposed to this revised document because the proposed revised standards are less rigorous.

**Response:** According to 20-A MRSA §6209 sub-§4, “The commissioner shall conduct a review of the content standards and performance indicators by content area on a 5-year cycle… This review should not be considered a major initiative nor does it have to lead to significant changes or shifts in the Maine Learning Results.” The steering committee and writing teams worked from the existing standards to revise and update, leaving the standards largely intact and streamlined for easier use and greater flexibility at the local level. The strengthened standards set a high bar for all Maine students, no matter their school. How Maine educators help students meet and exceed those standards – including curriculum, required reading or school operations – remains entirely a local decision. Instruction and curriculum are both a matter of local control. *No change was made as a result of this comment.*

1. **Comment (#6):** Commenter is concerned that there were not enough opportunities for more voices.

**Response:** In the 13-step standards review process there are multiple opportunities for public input. The Maine DOE sought public comment on the existing standards at the beginning of the process and again once the first draft of the standards was complete. In addition, the steering committee reviewed each standard and provided instructions for areas to address over the course of several meetings. Teams of K-12 teachers who represent Maine’s cultural and geographical diversity revised content standards based on the blueprint developed by the steering committee and approved by the Maine DOE. Nearly 50 teachers gave a total of 944 hours to this work during the summer of 2019. *No change was made as a result of this comment.*

1. **Comment (#6):** Commenter is concerned that updating the standards every five years indicates a complete restart of curriculum development as well.

**Response:** Since the proposed standards are a revision of the current standards, substantive curriculum alignment should not be necessary. During the implementation phase, significant support for changes will make this more transparent. *No change was made as a result of this comment.*

1. **Comment (#7):** Commenter suggested changing the wording within the Maine Guiding Principles from “Clear and effective communicator” to “effective.”

**Response:** This statement is in the Guiding Principles and is not subject to revision. *No change was made as a result of this comment.*

1. **Comment (#7):** Commenter is concerned about the clarity of references between “grammar” and “usage” when writing or speaking.

**Response:** Your comments provide information that will be very helpful during the implementation phase of standards-based instruction and could be included in resources at that time. *No change was made as a result of this comment.*

1. **Comment (#7):** Commenter suggests various edits for correctness and accuracy within final format, including changing “contested” to “contestable.”

**Response:** The document has been corrected by replacing the word “contested” with “contestable.”

1. **Comment (#7):** Commenter prefers using the word “effective” instead of “clear” when referring to writing.

**Response:** The writing team discussed at length the appropriate descriptive language to use for clarity and determined “clear” to be the best choice. *No change was made as a result of this comment.*

1. **Comment (#8):**Commenter stated, “After reviewing the Proposed English Language Arts Standards, I found the document to be clear and organized.”

**Response:** Thank you for your comment. *No change was made as a result of this comment.*