



May 28th, 2026

Blueprint Accountability and Implementation Board
45 Calvert Street
Annapolis, MD 21401

Maryland State Board of Education
200 West Baltimore Street
Baltimore, MD 21201

Dear Members of the Accountability and Implementation Board and Members of the Maryland State Board of Education,

We write as education equity advocates, community partners and researchers who share a deep commitment to the Blueprint for Maryland's Future and to the students it was designed to serve. We are encouraged by the passage of SB 311, which establishes a clear mandate for the Accountability and Implementation Board (AIB) and the Maryland State Department of Education (MSDE) to identify a methodology for counting students from low-income households and, critically, to do so through a collaborative and transparent process.

We write today to offer a constructive proposal: a process that fulfills the statutory requirements of SB 311, reflects lessons learned from prior efforts, and centers the students who depend most on an accurate and equitable funding formula.

Why process matters as much as methodology

The method used to count students living in poverty is not a technicality; it is the backbone of the Blueprint's equity-driven funding system. It directly determines per-pupil allocations through the Compensatory Education Weight and whether schools qualify for Concentration of Poverty Grants. Any change to this methodology will have real consequences for staffing, programming, and services across every jurisdiction in Maryland.

Recent attempts to resolve this question fell short, in part, because the process itself was inadequate. Reports were released late in compressed timelines, statutory requirements for stakeholder consultation were not met, and school districts, researchers, and advocates had no meaningful forum to respond before recommendations were made. SB 311 creates an opportunity

to do this differently and the law requires it. Section 3(b) mandates that the AIB and MSDE "engage in a collaborative and transparent process," including consultation with the Department of Budget and Management and the Department of Legislative Services. We urge you to treat that requirement not as a procedural checkbox, but as a substantive commitment.

A proposed process framework

We respectfully propose the following process elements as a foundation for meeting SB 311's collaborative and transparent standard:

1. Establish a standing stakeholder advisory group

Convene a formal, representative advisory group that includes local school system leaders, educators, unions, national and state researchers, community advocates (including immigrant-serving organizations), and student representatives of affected populations. This group should be established early, meet regularly, and have a defined role in reviewing evidence and providing input, not merely receiving updates after decisions have been made. Advisory group meetings should be publicly accessible and documented, including timely public notice and records retained.

2. Commission and publicly release a comprehensive methodology review

Any report used to inform the methodology recommendation must go beyond the statutory requirements SB 311 references and analyze how other states measure poverty, calculate eligibility for state programs for districts participating in the Federal Community Eligibility Provision (CEP), and consult with each local school system. We request that any such report be released with sufficient time (no less than 30 days) for stakeholders to review and respond before a recommendation is advanced. This report should also explicitly address and offer solutions for the impact of current and anticipated federal policy changes, including reductions in SNAP and Medicaid enrollment and the negative effect of immigration enforcement on direct certification participation.

3. Hold public hearings before any methodology recommendation is finalized

We request that the AIB and MSDE schedule at least one formal public hearing, accessible to both in-person and virtual participants, before any recommendation is advanced to the Governor or General Assembly. The hearing should include a side-by-side comparison of all methodology options under consideration, including the 2023 MSDE report, the 2025 Governor's Office for Children (GoC) report, and any additional methodologies identified through the stakeholder process. Testimony should be welcomed from Maryland-based and national experts.

4. Adopt clear evidence standards for any proposed methodology

Any proposed methodology should be required to meet a minimum evidence threshold: it must demonstrably predict student need, explain a meaningful share of variance in academic outcomes, and use multipliers that are grounded in documented data rather

than undisclosed assumptions. Proposed methodologies should be evaluated for their accuracy in capturing the full population of students experiencing poverty, not just those enrolled in specific federal programs.

The process should formally evaluate methodologies beyond those presented in the Governor's Office for Children report, including: higher direct certification multipliers (the Learning Policy Institute recommends 1.6); expansion of qualifying programs beyond SNAP and Medicaid to include Earned Income Tax Credit, housing vouchers, Low-Income Home Energy Assistance Program, and Affordable Care Act marketplace enrollment; community income methodologies; and alternative income verification forms, with attention to multilingual accessibility and lessons from other states like California and New York.

Proposed timeline

With an interim report due December 31, 2026, and a final report due September 30, 2027, there is sufficient time to do this work well. We propose the following milestones:

- Summer 2026: Convene the stakeholder advisory group; confirm statutory consultation requirements; commission methodology review report
- Summer 2026: Ensure stakeholder advisory group meeting videos and recordings, agendas, deliberations, and meeting notes are publicly accessible and documented, including timely public notice and records retention
- Fall 2026: Release full methodology review for public comment (minimum 30-day window); hold at least one public hearing
- Late Fall / Early Winter 2026: Stakeholder advisory group provides formal input; AIB and MSDE synthesize findings
- December 31, 2026: Interim report submitted, reflecting public input and documenting remaining open questions
- 2027: Continued refinement, additional stakeholder engagement, and validation testing
- September 30, 2027: Final report submitted with a fully validated, evidence-based methodology recommendation

A shared commitment to getting this right

We recognize that the AIB and MSDE face real constraints including statutory deadlines, staffing capacity, competing demands, and an urgent need to resolve the funding implications of the CEP transition.

Maryland made a historic commitment to educational equity through the Blueprint. That commitment depends on accurately counting the students who need the most support. If the methodology used to identify those students is built on incomplete data, undisclosed assumptions, or a process that excludes those most affected, the foundation of that commitment is undermined, regardless of how the formula is written.

We stand ready to support this work. We welcome the opportunity to meet with Board members and AIB/MSDE staff, contribute research and analysis, and help facilitate inclusive stakeholder engagement. We believe that if this process is done right, the result will be a methodology that is not just technically defensible but also broadly trusted by districts, families, and the General Assembly.

We ask that the AIB and MSDE acknowledge receipt of this letter and respond with a proposed timeline and process plan no later than 6/25/26. We are grateful for your leadership and your continued commitment to Maryland's students.

For Maryland's Future,

ABCs for Life Success
AFT Maryland
Alliance Against Seclusion and Restraint
Arts Education in Maryland Schools (AEMS)
Baltimore Algebra Project
Baltimore Teachers Union (BTU)
CASH Campaign of Maryland
Catholic Charities
Disability Rights Maryland
Kalman Hettleman
League of Women Voters of Maryland
Making Changes
Maryland Alliance for Racial Equity in Education (MAREE)
Maryland Center for Community Schools
Maryland Center on Economic Policy
Maryland Center for Developmental Disabilities at Kennedy Krieger Institute
Maryland Coalition for Community Schools
Maryland Coalition to Reform School Discipline
Maryland Education Coalition (MEC)
Mental Health Association of Maryland
Maryland Hunger Solutions
Maryland Out of School Time Network
Maryland State Education Association (MSEA)
MENTOR Maryland | DC
Partnership for Extraordinary Minds (xMinds)
Progressive Maryland
Public Justice Center
SOMOS (Students Organizing a Multicultural and Open Society)
Strong Schools Maryland
The Choice Program at UMBC
Timothy Meyer
World Class Grads-MD
We Are CASA