

STATE PLAN
PEER REVIEW CRITERIA
Peer Review Panel Notes Template

STATE: Maryland



U.S. Department of Education

SECTION A: TITLE I, PART A: IMPROVING BASIC PROGRAMS OPERATED BY LEAS

A.1: Challenging State Academic Standards and Assessments

Note: State Plan template item A.1 is submitted as part of the separate assessment peer review process consistent with ESEA section 1111(b) and 34 CFR § 200.2(d), and thus has no applicable peer review criteria in this document.

A.2: Eighth Grade Math Exception (ESEA section 1111(b)(2)(C) and 34 CFR § 200.5(b)(4))

Note: State Plan template items A.2.i and A.2.ii require binary yes/no responses from SEAs, and thus have no applicable peer review criteria.

A.2.iii: Strategies (ESEA section 1111(b)(2)(C); 34 CFR § 200.5(b)(4))

- If applicable,¹ does the SEA describe, regarding the 8th grade math exception, its strategies to provide all students in the State the opportunity to be prepared for and take advanced mathematics coursework in middle school (e.g., appropriate data and evidence that the strategies are likely to provide all students in the State that opportunity)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MD has been offering 8th graders the opportunity to take Algebra I since its adoption of the common core standards in 2010. However, the state’s response on pages 6 and 7 does not explicitly state strategies MD has implemented to prepare all 8th graders to be ready to take advanced math in middle school. MD stated on page 7 that approximately 50 percent of middle school students exit middle school having engaged in high school math due to the state allowing these students to take advanced coursework if they are ready to do so.</p> <p>The MD plan is assuming the adoption of Common Core Mathematics Standards implicitly tells stakeholders the names of courses to be offered to all grade 8 students. These standards include linear algebra expectations in grade 8, more than half of an Algebra I course in traditional textbooks. The state plan needs to explicitly provide details to justify how students are on track to take advanced mathematics courses, including which high school mathematics</p>

¹ In order for an SEA to exempt an 8th grade student from the mathematics assessment typically administered in 8th grade under ESEA section 1111(b)(2)(B)(v)(I)(aa), it must ensure that: a. the student instead takes the end-of-course mathematics assessment the State administers to high school students under ESEA section 1111(b)(2)(B)(v)(I)(bb); b. the student’s performance on the high school assessment is used in the year in which the student takes the assessment for purposes of measuring academic achievement under ESEA section 1111(c)(4)(B)(i) and participation in assessments under ESEA section 1111(c)(4)(E); and c. in high school: (1) the student takes a State-administered end-of-course assessment or nationally recognized high school academic assessment as defined in 34 CFR § 200.3(d) in mathematics that is more advanced than the assessment the State administers for 8th graders under ESEA section 1111(b)(2)(B)(v)(I)(bb); (2) the State provides for appropriate accommodations consistent with 34 CFR § 200.6(b) and (f); and (3) the student’s performance on the more advanced mathematics assessment is used for purposes of measuring academic achievement under ESEA section 1111(c)(4)(B)(i) and participation in assessments under ESEA section 1111(c)(4)(E).

	courses have EOC state administered exams implemented by the state.
<i>Strengths</i>	<p>External consultation with LEA math supervisors; tie to common core state standards; LEA plans for how students move through an accelerated sequence; use of multiple measures to achieve the same objective; evidence that approximately half of MD students are taking an accelerated math sequence</p> <p>The opportunity to take advanced math coursework in middle school is available to those students who are prepared to do so.</p>
<i>Weaknesses</i>	<p>While the SEA asserts that Algebra I is available to all eighth grade students as an option, there is no evidence or detail to support that claim. There is also no description of how the state ensures that students are prepared for this opportunity.</p> <p>MD does not specify the high school mathematics courses with EOC state administered tests. No information is shared about the mathematics course all grade 8 students are expected to complete since Algebra I is available to all grade 8 students (p. 7).</p> <p>Though PARCC has Algebra I, Geometry, and Algebra II or Integrated high school mathematics options, the plan does not state which ones are being implemented for the state accountability system.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MD must develop a plan that prepares kindergarten through seventh grade students to take advanced mathematics in eighth grade. MD must include in its plan a description of the course-taking pattern and assessments that eighth graders who take advanced mathematics will complete once they enter high school.

A.3: Native Language Assessments(ESEA section 1111(b)(2)(F) and 34 CFR § 200.6(f)(2)(ii) and (f)(4))

A.3.i: Definition

- Does the SEA provide its definition of “languages other than English that are present to a significant extent in the participating student population”?
- Does the SEA identify the specific languages that meet that definition?
- Does the SEA’s definition include at least the most populous language other than English spoken by the State’s participating student population?
- In determining which languages are present to a significant extent in the participating student population, does the SEA describe how it considered languages other than English that are spoken by distinct populations of English learners, including English learners who are migratory, English learners who were not born in the United States, and English learners who are Native Americans?
- In determining which languages are present to a significant extent in the participating student population, does the SEA describe how it considered languages other than English that are spoken by a significant portion of the participating student population in one or more of the State’s LEAs, as

well as languages spoken by a significant portion of the participating student population across grade levels?

	<i>Peer Response</i>
<i>Peer Analysis</i>	MD uses a well-established recommendation to determine the “languages other than English” that are present to a significant extent in the participating student population. Using the Office of Civil Rights recommendation of a 5% threshold, Spanish meets the condition.
<i>Strengths</i>	MD has established a definition in consultation with its LEAs. The threshold is set at 5% or 1000 students (whichever is less), which allows for some flexibility based on size of student population. Only one spoken language – Spanish – exceeds that threshold, though it appears the SEA is committed to reviewing data to determine whether other populations need to be added to the definition.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.3.ii: Existing Assessments in Languages other than English

- Does the SEA identify any existing assessments that it makes available in languages other than English, and specify for which grades and content areas those assessments are available?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The MD plan shows attention to both directions for administration of the test and actual tests. The plan assumes the Spanish version of the mathematics assessments is available for all tested grades and EOC assessments in high school since PARCC is providing the assessments. The state needs to explicitly state this information for all stakeholders.
<i>Strengths</i>	By being a member of the PARCC consortium, the state is able to offer ten different translations for all state assessments in ELA and mathematics. In addition, the Spanish mathematics assessment forms (paper and computer) are adapted to fit culture and linguistic sensitivities.
<i>Weaknesses</i>	MD does not explicitly identify the grades of the Spanish assessments.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewer(s)) <input checked="" type="checkbox"/> No (1 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MD must specify the grades reflected in “all assessed grades”

A.3.iii: Assessments not Available and Needed

- Does the SEA indicate the languages other than English that are present to a significant extent in the participating student population, as defined by the SEA and identified under A.3.i of the consolidated State plan, for which yearly student academic assessments are not available and are needed?

	<i>Peer Response</i>
<i>Peer Analysis</i>	MD is field testing a new science assessment and plans to have a Spanish version of the test after the validation of the test is completed.
<i>Strengths</i>	MD is field testing a new science assessment in 2017; once that process is final, the state will develop the assessment in Spanish.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.3.iv: Efforts to Develop Assessments

- Does the SEA describe how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population, as defined by the SEA and identified under A.3.i of the consolidated State plan template?
- Does the SEA’s description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population include the State’s plan and timeline for developing such assessments?
- Does the SEA’s description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population include a description of the process the State used to:
 - 1) gather meaningful input on the need for assessments in languages other than English;
 - 2) collect and respond to public comment; and
 - 3) consult with educators, parents and families of English learners, students, as appropriate, and other stakeholders?
- If applicable, does the SEA’s description of how it will make every effort to develop assessments in, at a minimum, languages other than English that are present to a significant extent in the participating student population include an explanation of the reasons (e.g., legal barriers) the State has not been able to complete the development of such assessments despite making every effort?

	<i>Peer Response</i>
<i>Peer Analysis</i>	MD’s response on page 8 outlines its plan for developing a Spanish version of its new science assessment. MD is also pursuing funding to develop a new version of its Early Learning Assessment in Spanish. Based on the significant Spanish speaking test population, these actions are appropriate. MD added information to this section when they explained on pages 8-10 their use of Universal Design for Learning.

	<p>The MD plan indicates a diverse group of stakeholders are involved in reviewing the challenges of learning for ELs. Other than the PARCC stakeholder group, the plan lacks details about how the groups are addressing the issue of assessments translated into other languages, including the information being provided to the groups to help them make decisions or recommendations.</p>
<i>Strengths</i>	<p>The state has consulted widely with ELL specialists at the LEA and school level as well as family engagement professionals and outside advocates and has committed to translate the science assessment into Spanish once field testing is complete as well as secure funding for translating the Early Learning Assessment into Spanish. Assessments are consistent with Universal Design for Learning principles which help ensure equal opportunity for all students to demonstrate skills and knowledge of the standard.</p> <p>MD engaged stakeholders in the decision-making regarding the use of assessments in other languages. Stakeholders included LEA, state, and higher education personnel.</p> <p>MD describes different stakeholder groups involved in discussions about challenges for ELs, including both local and regional groups as well as assessment focused educators (p. 8).</p>
<i>Weaknesses</i>	<p>Some reviewers believed the plan was not clear about how the stakeholder groups are addressing the need for assessments translated into other languages.</p> <p>The plan indicated there were state assessments available in content areas other than ELA, mathematics, and science, yet the state made no effort to indicate the availability of state assessments in these other content areas.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4: Statewide Accountability Systems & School Support and Improvement (ESEA section 1111(c) and (d))

A.4.i: Subgroups (ESEA section 1111(b)(3), 1111(c)(2))

A.4.i.a: Major Racial and Ethnic Subgroups of Students (ESEA section 1111(c)(2)(B))

- Does the SEA list each major racial and ethnic group that the SEA includes as a subgroup of students in its accountability system?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The MD plan provides a clear list of racial/ethnic students groups to be used

	for disaggregation of accountability data on page 10.
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.i.b: Additional Subgroups at SEA Discretion

- If applicable, does the SEA describe any additional subgroups of students other than the statutorily required subgroups (*i.e.*, economically disadvantaged students, students from each major racial and ethnic group, children with disabilities, and English learners) included in its statewide accountability system?

	<i>Peer Response</i>
<i>Peer Analysis</i>	No additional subgroups are currently included in the MD accountability system; however, MD stated on page 10 that it plans to add gifted and talented students by the end of the 2017-2018 school year. No information or justification was provided, only that they intend to take steps to do so.
<i>Strengths</i>	The MD plan is taking steps to include the gifted and talented student group in the state accountability system as part of the rankings. Other student groups (homeless, foster care and military dependents) will be included for reporting but not included in accountability.
<i>Weaknesses</i>	The MD plan provides no justification for inclusion of the gifted and talented group such as the size of the student group in the state or the number of schools in the state who will meet the minimum student group size.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.i.c: Previously Identified English Learners

Note: State Plan template item A.4.i.c requires a binary yes/no response from SEAs, and thus has no applicable peer review criteria.

A.4.i.d: If Applicable, Exception for Recently Arrived English Learners

Note: This peer review criterion applies only if a State selects the third option in item A.4.i.d in the consolidated State plan template for recently arrived English learners under which the State applies the

exception under ESEA section 1111(b)(3)(A)(i) or the exception under ESEA section 1111(b)(3)(A)(ii) to a recently arrived English learner.

- Does the SEA describe how it will choose which exception applies to a recently arrived English learner (e.g., a statewide procedure that considers English language proficiency level in determining which, if any, exception applies)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	N/A - MD is applying the exception under ESEA section 1111(b)(3)(A)(i)
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s)) <input checked="" type="checkbox"/> N/A (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.ii: Minimum N-Size (ESEA section 1111(c)(3)(A))

A.4.ii.a: Minimum N-Size for Accountability (ESEA section 1111(c)(3)(A)(i))

- Does the SEA provide the minimum number of students that the State determines is necessary to meet the requirements of any provisions under Title I, Part A of the ESEA that require disaggregation of information by each subgroup of students for accountability purposes, including annual meaningful differentiation and identification of schools?
- Is the minimum number of students the same State-determined number for all students and for each subgroup of students in the State (i.e., economically disadvantaged students, students from each major racial and ethnic group, children with disabilities, and English learners) for accountability purposes?

	<i>Peer Response</i>
<i>Peer Analysis</i>	MD identifies two different minimum student group sizes depending on the accountability category being evaluated but without justification for the two different criteria. The plan provides good evidence of the impact of N=10 on the inclusion of students across different student groups in the state accountability system, but lacks evidence on N=30 when analyzing graduation rates. The plan also assumes stakeholders will understand these numbers will be applied consistently when disaggregating data across non-graduation and graduation indicators, rather than explicitly including a statement to ensure the minimum student group size will apply across all student groups for disaggregation.
<i>Strengths</i>	
<i>Weaknesses</i>	MD provided no rationale to support two different n-sizes.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (0 peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))

<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MD must provide information as to why the n-size (of 10) for public reporting and accountability is different than the n-size of 30 for graduation. Reviewers relied on the table on page 12 as evidence that the N-size rule of 10 is applied to all subgroups; however, there was no similar evidence of such for graduation rate.
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A.4.ii.b: Statistical Soundness of Minimum N-Size (ESEA section 1111(c)(3)(A)(i))

➤ Is the selected minimum number of students statistically sound?²

	<i>Peer Response</i>
<i>Peer Analysis</i>	MD makes a statement on page 11 that its minimum Nsize of 10 is within an acceptable level of statistical reliability and validity without providing actual mathematical evidence. However, the table on page 12 provides reasonable evidence to support the N=10 group size. There is no evidence provided to support the N-size of 30 for the high school graduation indicator.
<i>Strengths</i>	<p>The MD plan includes a table of the number and percent of students in each student group included in the accountability analysis across schools to show the impact of the minimum size student group on the overall system for N=10 (p. 12).</p> <p>MD has chosen a very small N-size for both public reporting and accountability determinations. As explained, this small size allows for the maximum number of LEAs, schools and student subgroups to be represented in the accountability system.</p>
<i>Weaknesses</i>	<p>The state fails to provide sufficient discussion on how it knows that the validity and reliability of this n size for student groups is statistically sound. One reviewer expressed concern that an N=10 may create a confidence interval that results in a false positive. There is no mathematical modeling to support either of the presented group sizes.</p> <p>It would be helpful to MD stakeholders if MD would provide evidence as to the statistical reliability and validity of the N-size of 10.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer(s)) <input checked="" type="checkbox"/> No (3 peer reviewer(s))
<i>If no, describe the</i>	MD must provide information on how they arrived at the decision that an N-

² Consistent with ESEA section 1111(i), information collected or disseminated under ESEA section 1111 shall be collected and disseminated in a manner that protects the privacy of individuals consistent with section 444 of the General Education Provisions Act (20 U.S.C. 1232g, commonly known as the “Family Educational Rights and Privacy Act of 1974”). When selecting a minimum n-size for reporting, States should consult the Institute of Education Sciences report “[Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information](#)” to identify appropriate statistical disclosure limitation strategies for protecting student privacy.

<i>specific information or clarification that an SEA must provide to fully meet this requirement</i>	size of 10 is statistically sound.
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A.4.ii.c: How the SEA Determined Minimum N-Size (ESEA section 1111(c)(3)(A)(ii))

- Does the SEA describe how it determined the minimum number of students?
- Does the description include how the State collaborated with teachers, principals, other school leaders, parents, and other stakeholders when determining such minimum number?

	<i>Peer Response</i>
<i>Peer Analysis</i>	MD solicited feedback on N-size options with the ESSA Accountability Workgroup (consisting of Maryland Department of Education staff members and representatives from 10 of the 24 LEAs) over the course of 13 meetings held over a one-year time period. MD also discussed the N-size at regional listening tours and focus group meetings; however, the plan lacks the data and logic used to arrive at the decision. The plan excluded information to explain why the minimum student group size is different for non-graduation accountability indicators versus graduation rate indicators. More information regarding these decisions would make the state’s ESSA plan more transparent.
<i>Strengths</i>	The MD plan indicates the ESSA Accountability Workgroup, representing almost 40% of the state’s LEAs, discussed the minimum student group size as well as sharing the information on the state regional listening tour. MD previously used an N-size of 5 but increased it to 10 after discussions with stakeholders and in order to bring the public reporting and federal accountability systems into alignment. As stated on page 12, MD values a low N-size to ensure that LEAs and schools are held accountable for all students and student groups.
<i>Weaknesses</i>	The plan lacks data and arguments to support the change from N=5 to N=10.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewer(s)) <input checked="" type="checkbox"/> No (2 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MD must explain the reasoning behind why there are two different N-sizes, as the different n-sizes (10 for accountability and 30 for graduation) were of particular concern for two of the peer reviewers.

A.4.ii.d: Minimum N-Size and Ensuring Student Privacy (ESEA section 1111(c)(3)(A)(iii))

- Does the SEA describe how it ensures that the minimum number of students will protect the privacy of individual students?³

	<i>Peer Response</i>
<i>Peer Analysis</i>	MD assures to not reveal any personally identifiable information through suppression rules of all student groups less than 10 and also uses top coding of >95% to protect individual data from being released to the public; however, the state provides no evidence of how any of the reporting exclusion measures will protect individual student privacy.
<i>Strengths</i>	MD uses both top and bottom coding to suppress any individual student data.
<i>Weaknesses</i>	MD provides no information or specific citation to justify why a threshold of ten or greater will protect individual student privacy for the various accountability variables or indicators. While three of the peer reviewers felt comfortable with MD's suppression rules, one reviewer strongly encourages the state to provide additional assurance that individual students cannot be identified by combining multiple data sets.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewer(s)) <input checked="" type="checkbox"/> No (1 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MD should implement a statistically sound data suppression methodology that ensures individual student data cannot be revealed by using multiple data sets.

A.4.ii.e: If Applicable, Minimum N-Size for Reporting

- If the SEA's minimum number of students for purposes of reporting is lower than the minimum number of students for accountability purposes, does the SEA provide the minimum number of students for purposes of reporting?
- Is the SEA's minimum number of students for purposes of reporting consistent with the requirements in ESEA section 1111(i), including with respect to privacy and statistical reliability?

	<i>Peer Response</i>
<i>Peer Analysis</i>	The N-size for accountability and reporting purposes is unclear. MD needs to address the differences between the graduation rate accountability calculations (N=30) and the reporting criteria of N=10.
<i>Strengths</i>	

³ See footnote 5 above for further guidance.

<i>Weaknesses</i>	MD did not address the statistical reliability of the minimum student group size for reporting.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MD must provide clarification on which indicators will be reported at N=10 as well as a description of the statistical reliability at that threshold.

A.4.iii: Establishment of Long-Term Goals (ESEA section 1111(c)(4)(A))

A.4.iii.a: Academic Achievement (ESEA section 1111(c)(4)(A)(i)(I)(aa))

A.4.iii.a.1: Long-term goals

- Does the SEA identify (*i.e.*, by providing a numeric measure) and describe the long-term goals for all students for improved academic achievement, as measured by grade-level proficiency on the annual statewide reading/language arts and mathematics assessments (which must apply the same academic achievement standards to all public school students in the State, except those with the most significant cognitive disabilities)?
- Does the SEA identify and describe long-term goals for each subgroup of students?
- Does the SEA’s description include baseline data for all students and for each subgroup of students?
- Does the SEA’s description include the timeline for meeting the long-term goals?
- Is the timeline the same multi-year length of time for all students and for each subgroup of students?
- Are the long-term goals ambitious?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>As discussed on pages 13 to 15, MD’s long-term goal is to reduce the percent of non-proficient students by half by 2030. The goal is for all students and each subgroup of students (page 13). Academic achievement goals are included in Appendix A, Tables A on pages 76-77.</p> <p>It is unclear whether the long term goals include grades 3-8 and once in high school. On page 15, it implies that the goals are based on grades 3-8 but there is no mention of high school.</p> <p>The plan provided long-term goals based on 2016 data for this submission and plans to adjust using 2017 data when available. The plan indicates the long-term goals for the science assessment will be calculated after the first year of assessment implementation.</p>
<i>Strengths</i>	<p>The state identifies long-term goals for improved achievement, and lists goals for each subgroup of students.</p> <p>MD’s long-term goal extends from kindergarteners entering school during the 2018 school year until they graduate in 2030. These students would have been assessed on the MCCRS from K to high school. MD will include both its traditional and alternative assessment proficiency measures in the goals.</p>

	The timeline for the state’s long-term goals of academic achievement extends the goals to 2030 to allow the kindergarten students entering school in 2017-18 to reach their graduation year of 2030, a group who will experience the full effect of this ESSA plan. The goal setting process was applied to all student groups in the same way and reported in a table on page 14.
<i>Weaknesses</i>	<p>The long-term goal is the year 2030 when beginning kindergarteners will graduate. Setting such a long range target, coupled with a methodology to cut underperformance in half, results in long-term goals that lack ambition.</p> <p>MD does not provide information on the calculation used to determine the long-term goal assuming stakeholders know how to determine the value where the non-proficient proportion of a student group is reduced by half.</p> <p>The purpose of the graphic at the top of page 14 is not clear in respect to the long-term goals. The graphic component labeled “grade” suggests only grades 4 through 7 are included in some part of the accountability results. Since it is with the long-term goals, it may imply only grades 4 through 7 are included in the long-term goals, thus omitting half the grades being tested.</p> <p>No information is provided about what EOC data will be used for high school academic performance in the accountability system, especially in mathematics. PARCC high school assessments are only comprehensive EOC assessments when administering the paper version. The computer versions are broken up into multiple units.</p> <p>The graphic on page 14 implies grades 4-7; and wording on page 15 implies that the goals are based on grades 3-8.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MD must clarify if the long term goals include grades 3-8 and once in high school.

A.4.iii.a.2: Measurements of interim progress

- Does the SEA provide measurements of interim progress toward meeting the long-term goals for all students?
- Does the SEA provide measurements of interim progress toward meeting the long-term goals for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	MD lists the interim targets for “all students” and for each subgroup of students in Appendix A (pgs. 76-77), yet provides no information for stakeholders about how the targets were calculated. To create a transparent plan, a sample calculation would provide all stakeholders with complete information on these values.

<i>Strengths</i>	MD uses the same methodology of reducing the number of students not proficient by half by the year 2030 for all subgroups.
<i>Weaknesses</i>	<p>There is no formula or sample calculations to show how the annual measures are determined.</p> <p>This is an ambitious plan for those subgroups starting at a lower proficiency rate. MD must be prepared to assist LEAs with meeting the needs of these subgroups.</p> <p>The graphic on page 14 implies grades 4-7; and wording on page 15 implies that the goals are based on grades 3-8.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MD must clarify if the interim targets similar to what is discussed in A.4.iii.a.1 include grades 3-8 and once in high school.

A.4.iii.a.3: Improvement necessary to close statewide proficiency gaps

- Do the long-term goals and measurements of interim progress for academic achievement take into account the improvement necessary for subgroups of students who are behind in reaching those goals to make significant progress in closing statewide proficiency gaps, such that the State’s long-term goals require greater rates of improvement for subgroups of students that are lower achieving?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Academic achievement goals are included in Appendix A, Table A on pages 76-77. Groups (American Indian/Alaska Native, Black, and Hispanic, Students with Disabilities, English Learners, and Economically Disadvantaged) with lower proficiency rates are expected to show more progress compared to groups with higher baseline proficiency rates.</p> <p>MD outlines differences in expected change in proficiency rates for each student group over the period of this plan. The changes are parsed into equal intervals over the thirteen years to 2030 and will result in closing achievement gaps if the counter groups (e.g. non-economically disadvantaged) not listed show similar changes dependent on the current performance.</p> <p>The long-term goals and interim targets use the current proficiency performance level of each student group as the baseline for calculating the goals and targets, resulting in differences in the amount of increase expected of each student group. Student groups are being expected to double or triple the current level of proficiency over the next thirteen years.</p> <p>It is unclear as to whether or not the long term goals include grades 3-8 and once in high school. On page 15, it implies that the goals are based on grades 3-8.</p>

<i>Strengths</i>	<p>Long-term goals show that incremental progress is more aggressive for subgroups that begin farther behind. The target for EL students is much more aggressive over a shorter time threshold.</p> <p>MD uses the same methodology of reducing the number of students not proficient by half by the year 2030 for all subgroups.</p>
<i>Weaknesses</i>	<p>MD does not directly address closing achievement gaps.</p> <p>This is an ambitious plan for those subgroups starting at a lower proficiency rate. MD must be prepared to assist LEAs with meeting the needs of these subgroups.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.iii.b: Graduation Rate (ESEA section 1111(c)(4)(A)(i)(I)(bb))

A.4.iii.b.1: Long-term goals for four-year adjusted cohort graduation rate

- Does the SEA identify and describe the long-term goals for the four-year adjusted cohort graduation rate for all students?
- Does the SEA identify and describe the long-term goals for the four-year adjusted cohort graduation rate for each subgroup of students?
- Does the SEA’s description include baseline data for all students and for each subgroup of students?
- Does the SEA’s description include the timeline for meeting the long-term goals?
- Is the timeline the same multi-year length of time for all students and for each subgroup of students?
- Are the long-term goals ambitious?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MD currently includes a table on page 17 of long-term goals developed for 2020 using the four-year adjusted cohort. The long-term goals were approved in 2011 by the state’s legislature. The plan does not provide any justification for the continued use of this set of long-term goals, nor does it suggest what will happen after 2020.</p> <p>MD has set the four-year adjusted cohort graduation rate for all students and all subgroups at 95 percent. This goal was set in 2011; presumably at the same time ED required all states to use a cohort graduation rate. This was not made clear in the Consolidated Plan but it appears MD is using the same plan along with the same timeline of 2020. This was confusing since the state did not provide any narrative as to the rate of improvement each year and no student group meets the 95 percent goal in the final year of calculation (2020).</p>
<i>Strengths</i>	<p>The state has been using an adjusted cohort graduation rate for six years. Long term goals are set for overall performance as well as subgroup performance. The timeline of 2020 is reasonable and the same for all students.</p>

	MD will use data from 2019-2020 to re-set the process to determine the appropriateness of using a similar methodology of reducing the non-graduating students by half or to set a state goal for all students and student groups.
<i>Weaknesses</i>	<p>The long-term goals for the 4-year adjusted cohort's graduation rate only go to 2020, ten years short of the planned length of the state's ESSA plan. The baseline for graduation rate is 2011, rather than the 2017 baseline being used for academic achievement. Since graduation rates are commonly one to two years behind reported academic achievement, the baseline and final year for the long-term goal may need to be adjusted to reflect the data available at the identification of the first group of low performing schools in this plan.</p> <p>MD references a re-setting process for the graduation rate with an indication the previous process for setting goals and interim targets will be studied. The plan lacks transparency in what will happen with graduation rate after 2020.</p> <p>MD did not provide any information as to the annual rate of improvement necessary to meet the 95 percent goal, why 2020 was chosen as the final year of calculation, or why none of the groups are projected to meet the 95 percent rate.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.iii.b.2: If applicable, long-term goals for each extended-year adjusted cohort graduation rate

- If applicable (*i.e.*, if the SEA chooses, at its discretion, to establish long-term goals for one or more extended-year rates), does the SEA identify and describe the long-term goals for each extended-year adjusted cohort graduation rate for all students?
- If applicable (*i.e.*, if the SEA chooses, at its discretion, to establish long-term goals for one or more extended-year rates), does the SEA identify and describe the long-term goals for each extended-year adjusted cohort graduation rate for each subgroup of students?
- Does the SEA's description include baseline data for all students and for each subgroup of students?
- Does the SEA's description include the timeline for meeting the long-term goals?
- Is the timeline the same multi-year length of time for all students and for each subgroup of students?
- Are the long-term goals ambitious?
- Are the long-term goals more rigorous than the long-term goals set for the four-year adjusted cohort graduation rate?

	<i>Peer Response</i>
<i>Peer Analysis</i>	MD's response on page 19 explains the state's current methodology for its determination and long-term goals for graduation rate. Lower performing students must demonstrate greater improvement

	<p>MD shows more rigorous graduation rates for the 5-year adjusted cohort, reflecting the additional year for students to complete graduation requirements. The 5-year adjusted cohort graduation rate table only extends to 2020 with no information on how the latter 10 years of the ESSA plan will be addressed. The lack of goals for 2030 makes it difficult to determine if they are ambitious.</p> <p>MD includes a 5-year cohort graduation rate as shown on page 18. As with the four-year cohort, MD has the final calculation in the year 2020 although there was no reasoning given for this other than it was established and approved in 2011 by the Maryland State Board of Education. Three subgroups meet the 95 percent goal with Asians at 94.77, Pacific Islanders at 95, and Two or More Races at 94.87.</p>
<i>Strengths</i>	<p>The five year rate allows for slightly more ambitious graduation goal. The same length of time is expected for all students with similarly differentiated growth targets.</p> <p>MD will use data from 2019-2020 to re-set the process to determine the appropriateness of using a similar methodology of reducing the non-graduating students by half or to set a state goal for all students and student groups.</p> <p>MD acknowledges that some students need additional time to complete graduation requirements giving specific mention to students with disabilities.</p>
<i>Weaknesses</i>	<p>The long-term goals for the 5-year adjusted cohort's graduation rate only go to 2020 (p. 18), ten years short of the planned length of the state's ESSA plan. The baseline for graduation rate is 2011, rather than the 2017 baseline being used for academic achievement. Since graduation rates are commonly one to two years behind reported academic achievement, the baseline and final year for the long-term goal may need to be adjusted to reflect the data available at the identification of the first group of low performing schools in this plan.</p> <p>MD references a re-setting process for the graduation rate with an indication the previous process for setting goals and interim targets will be studied. The plan lacks transparency in what will happen with graduation rate after 2020.</p> <p>There are many circumstances in which students need additional time to complete high school graduation requirements. While traditionally students with disabilities have required more time and the law allows for these students to remain in school until 21 years of age, there are other students who also need additional time. MD should include such wording in the narrative and not limit it to just students with disabilities.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.iii.b.3: Measurements of interim progress

- Does the SEA provide measurements of interim progress toward the long-term goals for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate for all students?
- Does the SEA provide measurements of interim progress toward the long-term goals for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Graduation goals located on pages 77 and 78 in Appendix A, Table B and on pages 17 and 18 begin with baseline year 2011 and extend to 2020. Both four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate for all students and subgroups of students are presented.</p> <p>MD only provides graduation rate long-term goals to 2020, rather than 2030, resulting in interim progress targets missing through the full length of the ESSA plan. The plan lacks justification for reusing a graduation rate long-term goal and interim targets and how/when it will be extended through 2030.</p> <p>MD provides the measurements of interim progress toward the long-term goals for the four-year cohort beginning in 2011 and ending in 2020. MD explains on page 19 that they will use the same methodology as that for academic achievement; i.e. reducing the percent of non-graduating students by half. MD fails to provide adequate explanation for the calculation and, thus, the transparency and the ability for stakeholders to understand the calculation is difficult. After some calculations and assumptions from previous information, one peer reviewer determined that the calculation is based on the 95 percent set for graduation and not the 100 percent proficient set for academic achievement. This brings the interim progress to approximately a .73 increase each year for the all students group. The rate of increase per year for the lowest subgroup, special education, is a 2.24 increase per year.</p>
<i>Strengths</i>	<p>MD provided measurements of interim progress toward a long-term goal for all students and subgroups; the state also expressed a willingness to revisit and reset the targets within several years if they lack ambition.</p> <p>The same calculation is used for all groups of students.</p>
<i>Weaknesses</i>	<p>MD provides a limited number of years of interim targets since it only provides long-term goals through 2020 (pp. 17-18). The tables provide data for all student groups used in the accountability system.</p> <p>MD did not fully explain how the rates were calculated. Peer reviewers had to rely on information from the academic achievement section, assume 95 percent was the goal, and then do the calculations to verify the MSED information. For many stakeholders, this would be overwhelming, if not impossible.</p>

<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.iii.b.4: Improvement necessary to close statewide graduation rate gaps

- Do the long-term goals and measurements of interim progress for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate take into account the improvement necessary for subgroups of students who are behind in reaching those goals to make significant progress in closing statewide graduation rate gaps, such that the State’s long-term goals require greater rates of improvement for subgroups of students that graduate from high school at lower rates?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MD’s long-term graduation rate goals require greater “steeper” improvement from student groups with lower graduation rate to close achievement gaps. This expectation is evident in the tables shown on pages 17-18 and 77-78.</p> <p>MD accounted for the differences in the graduation rates for each subgroup and held steady to the 95 percent; however, the calculations were not included.</p>
<i>Strengths</i>	Lower performing subgroups have more aggressive growth targets.
<i>Weaknesses</i>	<p>MD references a resetting process for graduation rate long-term goals and interim targets, but provides no details (p. 19). The text suggests the previous process used to set long-term goals and interim targets may or may not be used in future setting of goals and targets.</p> <p>MD did not provide the calculations as to how the interim progress was determined.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.iii.c: English Language Proficiency (ESEA section 1111(c)(4)(A)(ii))

A.4.iii.c.1: Long-term goals

- Does the SEA identify and describe the long-term goal for increases in the percentage of English learners making progress in achieving English language proficiency, as measured by the statewide English language proficiency assessment?
- Does the SEA’s description include baseline data?
- Does the SEA’s description include the State-determined timeline for English learners to achieve English language proficiency?
- Is the long-term goal ambitious?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MD will use a proficiency level growth-to-target model as its method for determining long-term goals as stated on page 19. The Growth-to-Target Model for ELP table is presented on page 20. MD’s annual measurement of interim progress and long-term goal are sufficiently explained on pages 21; 78 and 79. Baseline data is 46%; by 2030, 73% of ELs will achieve English language proficiency (page 20). The goal appears ambitious considering the rigorous WIDA ACCESS 2.0 students will take.</p> <p>MD outlines a logical methodology for identifying the long-term goals for acquiring English language acquisition within six years for the general EL population. The growth-to-target table published with this plan provides an initial ambitious target for guiding progress of individual students while also providing schools and LEAs with clear program effectiveness targets. The plan identifies potential adjustments which may be needed as more WIDA Access 2.0 data becomes available.</p>
<i>Strengths</i>	<p>It is clear that the state has put in significant effort to figure out the best way to set long-term goals for increasing the percentage of English Language learners who are proficient. The state proposes to use a growth to standard calculation pegged against WIDA levels. The goal is to exit students who are proficient within six years. This approach ensures that students who are farther behind in their language fluency have a more aggressive target to meet. Baseline data are provided. The long-term goal is to cut in half the rate of students who are not fluent in English by 2030.</p> <p>As additional WIDA ACCESS 2.0 data are available, MD will re-examine its attainment goals. MD will use multi-year aggregation to calculate growth. MD will also collaborate with CCSSO to develop a model for early identification of EL students who may not meet expected goals. (page 20)</p> <p>MD provides a clear timeline for ELs to reach English language acquisition based on their entrance score. The accountability system’s growth-to-target expectations will allow for variation in student performance from year by including the option for multi-year aggregation of growth.</p> <p>MD is a member of the WIDA consortium which is an excellent resource for states in the area of proficiency standards and assessments for English learners.</p>

<i>Weaknesses</i>	<p>The approach is complex and may be challenging to explain to LEAs. The annual growth targets lack ambition, similar to the proficiency concerns expressed previously.</p> <p>MD explains how the long-term goal for students making progress in reaching English language acquisition, within six years, without confirming it was not biased for any racial/ethnic group. The analysis of past performance showed 46% of ELs reached exit criteria within 6 years, but did not include information on the proportion of each racial/ethnic group achieving the exit criteria to establish it reflected the proportionality of the total EL population.</p> <p>MD identifies the achievement attainment goal as a combination of a composite score 5.0 or higher on Access 2.0 and a 4.0 on Literacy, with no definition of what the Literacy score is. Access provides subscores on four different constructs: reading, listening, speaking, and writing. The first two are passive language skills and the latter two are active language skills. The source of the Literacy score may or may not be PARCC, but needs to be comprehensive to include all grade levels assessed for English language acquisition. This defined attainment goal contradicts the statement in the previous paragraph saying the state does not use conjunctive exit criteria.</p> <p>WIDA Access standardized assessments can be used for students receiving EL services in grades kindergarten through twelfth grade. The plan provides no information on what grades will be tested and included in the state’s accountability system.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.iii.c.2: Measurements of interim progress

- Does the SEA provide measurements of interim progress toward the long-term goal for increases in the percentage of English learners making progress in achieving English language proficiency?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MD provides both specific interim values as well as the calculations used to arrive at those values using the long-term goal. The plan shows awareness of the need to adjust the interim targets as more data is made available. The plan does not explicitly attend to the need of different interim values for different school groups such as elementary, middle, and high schools.</p> <p>MD used a similar methodology as that for academic achievement for calculating the measurements of interim progress for ELs by reducing the gap by half.</p>

<i>Strengths</i>	<p>Measurements of interim progress are provided based on WIDA ACCESS 2.0's proficiency levels. Multiple year aggregations are used to calculate growth.</p> <p>MD is consistent with their methodology of calculating final measures; i.e. academic achievement, proficiency, etc.</p>
<i>Weaknesses</i>	<p>A table on page 21 identifies the specific yearly annual measurements for the proportion of ELs making their growth-to-target expectations in a school or LEA. The largest percentage increase is at the end of the 13-year length of the plan, the opposite end of the statistically logical location. The annual difference from 2018 through 2029 is 2%, with a final year change of 3%, while statistically it is easier to make large changes further from 100% than when closer to 100% making expectations.</p> <p>Calculating across K-12 may mask achievement differences between elementary, middle, and high school.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.iv: Indicators (ESEA section 1111(c)(4)(B), 1111(c)(4)(E)(ii))

Note: A single indicator may consist of multiple components or measures. Peers must review each such component or measure for compliance with all of the required elements.

A.4.iv.a: Academic Achievement

- Does the SEA describe the Academic Achievement indicator used in its statewide accountability system, including that the SEA uses the same indicator for all schools in all LEAs across the State?
- Does the description include how the SEA calculates the indicator, including: 1) that the calculation is consistent for all schools, in all LEAs, across the State; 2) a description of the weighting of reading/language arts achievement relative to mathematics achievement; 3) if the State uses one, a description of the performance index; 4) if, at the high school level, the indicator includes a measure of student growth, a description of the growth measure (*e.g.*, a growth model); and 5) if the State averages data, a description of how it averages data across years and/or grades (*e.g.*, does the State use a uniform averaging procedure across all schools)?
- Is the indicator valid and reliable?
- Is the indicator based on the SEA's long-term goals?
- Can the indicator be disaggregated for each subgroup of students?
- Is the indicator measured by grade-level proficiency on the annual statewide reading/language arts and mathematics assessments?

- Does the indicator measure the performance of at least 95 percent of all students and 95 percent of all students in each subgroup?

	<i>Peer Response</i>
<i>Peer Analysis</i>	MD identifies an Academic Achievement Indicator which is a composite of ELA and mathematics performance equally weighted after calculating a two-part score for both content areas. The brief description of the two parts requires the stakeholder reading the plan to infer how the two parts are calculated, and their ranges, before they are combined to create the individual ELA or mathematics scores. A sample calculation for the composite score starting with the separate content scores, ELA and mathematics, would provide transparency for the Academic Achievement Indicator.
<i>Strengths</i>	MD's academic achievement indicator will equally weigh the ELA and mathematics performance composite scores. Half of the performance composite score for each content area will include the school or LEAs progress toward the long-term goal, a value ranging from 0 to 100.
<i>Weaknesses</i>	<p>The proposal lacks a rationale for why the performance index is chosen and what the impact is expected to be on reported scores.</p> <p>MD describes the second half of the performance composite score for both content areas as the average of the earned achievement levels for all students in the school or LEA, a value from 1 and 5. The plan is not clear what the interpretation of the word 'half' implies since the range of this part of the score will not be close to the potential range of the other half of the composite score. The plan needs to identify how the addition of a value between 0 and 100 and a value between 1 and 5 is meaningful. Or the plan needs to clarify the calculation and range of scores for the second half of the composite score for the academic achievement indicator.</p> <p>The second half performance index does not identify how the averages of the PARCC achievement levels and the MSAA achievement levels will be merged to create the final ELA or mathematics scores. The PARCC achievement levels range from 1 to 5 while the MSAA achievement levels range from 1 to 4 creating a need for some standardization between the two averages before combining them into the ELA or mathematics overall score.</p> <p>The performance index was not clearly explained.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MD must provide a clearer explanation as to how the performance index is determined, including the validity and reliability as it relates to performance against the average and the overall composite score (e.g. sample calculation).

A.4.iv.b: Other Academic Indicator for Elementary and Secondary Schools that are Not High Schools

Note: If the SEA uses a different Other Academic indicator for each grade span, peer reviewers must separately review each indicator that an SEA submits. For example, if an SEA submits one Other

Academic indicator for elementary schools and a different Other Academic indicator for middle schools, then peer reviewers will provide feedback, using the criteria below, separately for each indicator.

- Does the SEA describe the Other Academic indicator used in its statewide accountability system for public elementary and secondary schools that are not high schools, including that the SEA uses the same indicator and calculates it in the same way for all elementary and secondary schools that are not high schools, in all LEAs, across the State, except that the indicator may vary by each grade span?
- Does the SEA describe, if applicable, how it averages data across years and/or grades (e.g., does the State use a uniform averaging procedure across all schools)?
- If the SEA uses a different indicator for each grade span, does it describe each indicator, including the grade span to which it applies?
- If the Other Academic indicator is not a measure of student growth, is the indicator another valid and reliable statewide academic indicator?
- If the Other Academic indicator is not a measure of student growth, does the indicator allow for meaningful differentiation in school performance?
- Can the indicator be disaggregated for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MD plans to use two “other academic indicators”: academic growth (SGPs) in language arts and math for grades 3 – 8, and course completion for elementary and middle schools (pages 23-24).</p> <p>MD does not justify the use of separate multiple constructs for the other academic indicator in the differentiation calculations, rather than selecting the measure most meaningful for showing school or LEA progress toward the long-term improvement of student learning. The information provided in the table (pp. 23-24) raises more questions than answers for stakeholders about what is included in the different components, especially the academic growth component. The plan lacks information on the validity and reliability of the different components which will be used for comparison across schools. The use of different constructs affects the transparency of the ESSA plan for stakeholders, though the weighting does provide an indication of the state’s policymakers’ order of importance of the different constructs.</p> <p>MD desires to identify measures of kindergarten readiness and academic growth through grade 3 no later than the 2018-2019 school year. MD mentioned incorporating this into the accountability system but no timeline was given.</p>
<i>Strengths</i>	<p>The state describes the other academic indicators (growth for ELA and math in grades 3-8; percentage of 5th and 8th graders that pass a well-rounded curriculum with percentage passing science exam in grades 5 and 8 and social studies in year 8). The state describes which grade span each indicator applies to; and attempts to describe how the measures are valid and reliable as well as how the measures allow for differentiation. All indicators can be disaggregated.</p> <p>K-3 academic readiness will be monitored, and possibly incorporated in the state’s accountability system.</p>

	<p>The state will be exploring a growth-to-standard measure after sufficient PARCC results are available for analysis.</p> <p>MD is to be commended for including science, social studies, kindergarten readiness, academic growth through grade 3, and credit for completion of a well-rounded curriculum for elementary and middle school students into the other academic indicator.</p>
<p><i>Weaknesses</i></p>	<p>The plan lacks details about the student growth percentile (SGP). The plan needs to inform stakeholders whether this measure is normed or will be calculated based on the state cohort each year. The plan also needs to justify the use of the median percentile rank, rather than the mean percentile rank.</p> <p>The plan lists grade 3 as one of the grades to be included in the academic growth component, yet there is no indication of the prior score from PARCC or MSAA that will be used to determine this value for grade 3.</p> <p>The plan provides no information on how student growth for mathematics will be consistently measured across different types of grade 8 assessments, the PARCC grade 8 and the Algebra I high school EOC assessments, to ensure inclusion of all grade 8 students in the academic growth component.</p> <p>The plan provides no evidence of the validity and reliability of the growth percentile, a relative measure of student growth, not dependent on student performance on the academic content standards.</p> <p>The initial use of the ‘credit for completion of a well-rounded curriculum’ will be excluding the science test results for grade 5 and 8 during the first year of the ESSA accountability system. The plan provides no information on how the addition of the measure in the subsequent years will be comparable to results in 2018.</p> <p>The plan needs to clarify how they will determine the percentage of students passing different courses at the elementary and middle schools without using course grades (pp. 23 & 24). In explaining the non-use of course grades, the plan needs to include information on: a) how the measure will be valid and reliable, not inflated, across schools and LEAs; and b) the effect of disaggregating the measure by different student groups.</p> <p>The plan would be strengthened with more information about the connection between the ‘credit for completion of a well-rounded curriculum’ in elementary/middle school and the research on high school persistence and college readiness (p. 24). The reference to 8th and 9th grade performance as part of the statement about the research does not explain the importance of the elementary course completion measure.</p> <p>Only results from the MISA will be ready to be included into the accountability system in the 2018-2019 school year.</p> <p>MD does not have a standard state grading system so the reliance on grades for the “percent of students passing . . .” may be difficult.</p>

<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>MD must provide clarification on how the median student growth percentile (SGP) will be calculated, as well as how the performance determination is calculated.</p> <p>MD must provide clarification on how credit for completing a well-rounded curriculum is calculated, as well as the state’s evidence that course passing is valid and reliable.</p>

A.4.iv.c: Graduation Rate

- Does the SEA describe the Graduation Rate indicator used in its statewide accountability system for public high schools in the State, including that the SEA uses the same indicator across all LEAs in the State?
- Does the description include how the SEA calculates the indicator including: 1) that the calculation is consistent for all high schools, in all LEAs, across the State; 2), if applicable, whether the SEA chooses to lag adjusted cohort graduation rate data; and 3) if applicable, how the SEA averages data (e.g., consistent with the provisions in ESEA section 8101(23) and (25), which permit averaging graduation rate data over three years for very small schools)?
- Is the indicator valid and reliable?
- Is the indicator based on the SEA’s long-term goals?
- Is the indicator based on the four-year adjusted cohort graduation rate?
- If the State, at its discretion, also includes one or more extended-year adjusted cohort graduation rates, does the description include how the four-year adjusted cohort graduation rate is combined with that rate or rates within the indicator?
- If applicable, does the SEA’s description include how the State includes in its four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rates students with the most significant cognitive disabilities assessed using an alternate assessment aligned to alternate academic achievement standards under ESEA section 1111(b)(2)(D) and awarded a State-defined alternate diploma under ESEA section 8101(23) and (25)?
- Can the indicator be disaggregated for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MD provides a description of the two different adjusted cohorts used for the two graduation rates, 4-year and 5-year, in the graduation rate indicator without explaining how the two rates will combine into one composite score. The calculation of the composite will provide information for determining the validity and reliability of the graduation rate indicator.</p> <p>The rate will be calculated for all students and for all subgroups (pgs. 24-25).</p>
<i>Strengths</i>	<p>The state will use both 4-year and 5-year adjusted cohort graduation rates; both will be measured and reported separately and there is no alternative diploma.</p> <p>MD is using both graduation cohorts in its accountability plan. Both rates will be measured and reported separately.</p> <p>MD places a higher point value to those schools that graduate students within four years.</p>

<i>Weaknesses</i>	<p>The plan does not tell the last date (timeframe) a student can graduate and be included in the 5-year cohort.</p> <p>MD describes the graduation rate indicator as two separate components (the four-year adjusted cohort graduation rate and the five-year adjusted cohort graduation rate), but does not explain the composite score that will be used for the differentiation score.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.iv.d: Progress in Achieving English Language Proficiency Indicator

- Does the SEA describe the Progress in Achieving English Language Proficiency indicator used in its statewide accountability system, including that the SEA uses the same indicator across all LEAs in the State?
- Is the indicator valid and reliable?
- Is the Progress in Achieving English Language Proficiency indicator aligned with the State-determined timeline described in A.4.iii.c.1?
- Does the indicator consistently measure statewide the progress of all English learners in each of grades 3 through 8 and in the grade for which such English learners are otherwise assessed under ESEA section 1111(b)(2)(B)(v)(I) during grades 9 through 12?
- Does the SEA’s description include the State’s definition of English language proficiency, based on the State English language proficiency assessment?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MD will measure progress toward English language proficiency using the WIDA ACCESS 2.0. The state will use the ACCESS 2.0 composite score for its growth-to-target of proficiency within a maximum of six years (page 25).</p> <p>MD identifies a transparent progress in achieving English language proficiency indicator by using only one measure which was defined in an A.4.iii.c. The information provided therein provides evidence the indicator is valid and reliable.</p> <p>MD has worked with the Council of Chief State School Officers (CCSSO) and EL specialists to set a proficiency level growth-to-target model for students to attain EL proficiency within six years.</p>
<i>Strengths</i>	<p>MD has set a growth to target metric based on WIDA performance with the goal of proficiency within six years.</p> <p>The progress in achieving English language proficiency indicator has one component which was clearly defined in the section on English Language Proficiency (pp. 19-20).</p>

	MD collaborated with CCSSO and EL specialists to develop this model.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.iv.e: School Quality or Student Success Indicator(s)

Note: Peer reviewers must separately review each School Quality or Student Success indicator that an SEA submits. For example, if an SEA submits one School Quality or Student Success indicator for high schools and a different School Quality or Student Success indicator for elementary and middle schools, then peer reviewers will provide feedback, using the criteria below, separately for each indicator. For any School Quality or Student Success indicator that does not apply to all grade spans, the SEA’s description must include the grade spans to which it does apply. (ESEA section 1111(c)(4)(B)(v))

- Does the SEA describe each School Quality or Student Success indicator used in its statewide accountability system for all public schools in the State?
- If the SEA uses a different indicator for each grade span, does it describe each indicator, including the grade span to which it applies?
- Does the indicator allow for meaningful differentiation in school performance?
- Is the indicator valid, reliable, comparable, used statewide in all schools (for the grade span to which it applies), and calculated in a consistent way?
- Can the indicator be disaggregated for each subgroup of students?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MD identifies three different components of the school quality/student success (SQ/SS) indicator which will be included in the overall differentiation score separately. The plan provides no information on how the state decided to include these different components, nor the validity and reliability of the individual measures used for each component. The plan suggests all the components will be revisited once complete data is available for all three components, yet no timeline is identified for when this will happen. The plan would be strengthened if stakeholders were aware of the collaboration between policymakers, teachers, school administrators, parents, and other education advocates used to identify this select group of indicators.</p> <p>MD includes three measures that apply to all grades in the School Quality/Student Success indicator: 1) chronic absenteeism; 2) school climate; and 3) access to a well-rounded curriculum.</p> <p>Chronic absenteeism is defined as any student who is absent 10 percent or more of the school year.</p> <p>School climate will be assessed via a survey to be developed in collaboration</p>

	<p>with REL-Mid Atlantic and Mathematica.</p> <p>Access to a well-rounded curriculum is defined for elementary, as the percent of 5th grade students enrolled in science, social studies, fine arts, physical education and health. MD should provide an explanation as to the extent that 5th grade students have a choice in which courses they are enrolled in.</p> <p>Access to a well-rounded curriculum is defined for high schools is defined as the percent of students who graduate with a certification of program completion; enrolled in an AP or IB course; participate in dual enrollment; or a CTE concentrator.</p> <p>MD describes on page 26 that preliminary analysis indicates the proposed measures are valid, reliable, and comparable across schools; however, they did not provide any data to support this claim.</p> <p>MD also added an indicator (f) of Readiness for Postsecondary Success for high schools only with two measures: 1) percent of 9th grade students “on-track” by earning at least four credits in any of the following: math, English language arts, science, social studies, and/or world language (it is assumed that “on-track” implies on track to graduate in four years); and 2) credit for completion of a well-rounded curriculum, with well-rounded curriculum being defined by numerous options; i.e. AP, IB, SAT, ACT, ASVAB, dual enrollment, CTE apprenticeships, CTE industry certifications, etc.</p> <p>It is unclear why MD added the additional indicator since it appears that the measure for credit for completion of a well-rounded curriculum is duplicative of the high school measure in the SQ/SS indicator for the same area (pgs. 26-27). Granted that one is “access to” and the other is “credit for completion of”, but it seems it could have been included in the SQ/SS indicator.</p>
<p><i>Strengths</i></p>	<p>There are multiple measures contained within the success indicator (chronic absenteeism, school climate and access to a well-rounded curriculum – percent of 5th graders for elementary, 8th graders for middle, and AP/IB/DC/CTE for high school). Absenteeism data will provide differentiation; measures are statewide and available for all students and subgroups. Information is provided about which grade spans use which indicator(s). Absenteeism is valid and reliable. The state has also added a postsecondary indicator comprised of the percent of ninth graders that complete a required course sequence (on-track) and a variety of ways in which a graduate could show post-high school readiness (ACT, SAT, ASVAB, CTE, U of M entry requirements, etc.)</p> <p>MD is ambitious in selecting multiple measures to gauge SQ/SS. MD’s plan notes that state statute prohibits “school quality or student success indicators” from being based on student testing (page 28).</p> <p>The chronic absenteeism component and the school climate component are inclusive of all possible grades in any school building.</p>

<i>Weaknesses</i>	<p>MD’s plan does not provide strong evidence of the validity, reliability, or comparability for each of the SQ/SS measures and its indicator. The plan does not provide sufficient evidence to support the selection of the measures.</p> <p>The school climate component is described as an aggregated score reflecting survey responses of three different groups (students, teachers, and parents) without details of the methodology to be used for aggregating the data. The plan would be strengthened with information on the research studies to be used to help formulate the methodology.</p> <p>MD failed to provide justification, either through data or public input, as to why the specific area of chronic absenteeism, school climate, access to a well-rounded curriculum, and on-track in 9th grade are in need of improvement.</p> <p>MD did not explain why it included an additional indicator of “F” and why the two measures (on-track in 9th grade and completion of a well-rounded curriculum) could not have been included in the SQ/SS indicator.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>MD must provide documentation that shows each SQ/SS measure is valid and reliable. This documentation should examine both the individual measures as well as the composite indicator.</p> <p>Given the multiple ways in which this accountability system permits a graduate to demonstrate postsecondary readiness, MD must also provide documentation showing that these options are comparable.</p>

A.4.v: Annual Meaningful Differentiation (ESEA section 1111(c)(4)(C))

A.4.v.a: State’s System of Annual Meaningful Differentiation

- Does the SEA describe its system of meaningfully differentiating, on an annual basis, all public schools in the State?
- Is the State’s system of annual meaningful differentiation based on all indicators in the State’s accountability system?
- Does the State’s system of annual meaningful differentiation include the performance of all students and each subgroup of students on each of the indicators in the State’s accountability system?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MD has a state statute which requires a composite score, calculated numerically in a percentile form when reporting school/LEA accountability data. Measures for all students and for each subgroup will be issued. Measures for all students will be percentile ranked. From these rankings, a star rating system will be used to communicate to stakeholders a school or LEA’s performance for the “all students” group. In addition to achievement data being reported, other indicators will be reported. Data will be reported in categories for all students and by subgroups. (pages 28-29)</p>

	<p>The state’s plan focuses on the ‘all students’ group for establishing the ranking of schools in the state with no explicit information on calculations to be used to combine the different indicator scores. The methodology and calculations to be used for determining a single combined differentiation score with all the indicators would provide a way for stakeholders to assess the validity of the school ranking process. The percentile rank used for determining low performing schools does not reflect the school’s actual differentiation score, potentially creating gaps in the differentiation score without creating a gap in the reported ranking. The plan identifies a method of assigning stars to schools based on their percentile ranking of the differentiation score with the low performing, low graduation rate, and low student group performance schools receiving two different star ratings. Though the plan indicates the rating system is under development, the state should be able to propose an initial system that assigns a star category to each school in the state and providing a transparent accountability system.</p> <p>MD describes the state’s system of annual meaningful differentiation on pages 28-32. While MD claims that stakeholders expressed a desire for simplicity, the system MD describes is anything but simple.</p> <p>The use of the star symbol to designate category assignments (from 5 stars being the highest designation to 1 star being the lowest) does lend itself to an easily understandable identification of schools; however, the calculation behind the stars is complex and not yet fully developed.</p> <p>The use of the arrows to depict the description of schools in meeting the academic and non-academic indicators is not particularly helpful given the arrows are all very similar except for colors surrounding the symbol.</p> <p>The hypothetical examples provided in the Consolidated Plan, especially the table shown on page 32, adds to the confusion about how the final total score and percentile score were calculated because the columns of “equity gap” and “met annual goals” are not described elsewhere in the plan.</p> <p>The explanation of points calculated as a percent of the whole vs. assigned scores and why they differ depending on the measure will be confusing to most of the general public.</p>
<p><i>Strengths</i></p>	<p>MD describes its system to meaningfully differentiate on an annual basis all public schools in the state, including how data will be turned into an overall categorical rating. This system is based on all indicators in the state’s accountability system. The system accounts for the performance of all students and each subgroup, though the way in which this occurs is not immediately clear.</p> <p>The “all students” group and each subgroup of students will be used to determine which school meets the criteria for comprehensive or targeted support.</p> <p>MD’s plan indicates all indicators and their components will be included in the ‘all student’ differentiation score dependent on the school’s classification as an</p>

	<p>elementary, middle, or high school as outlined in the description of the indicators.</p> <p>MD’s system will be able to differentiate the performance of the “all students” group and each subgroup of students.</p> <p>MD has put considerable thought and effort into this system.</p>
<i>Weaknesses</i>	<p>The state does not provide a sufficient description of the equity gap and how this aspect of the calculation will be considered within the overall score. Moreover, the calculations are incredibly nuanced and complex across three levels of calculations leading to concerns about the ability of consumers to understand the information and thus act on the information. Finally, there is much that is not yet final, such as the exact system for turning data into a categorical rating, and the assignment system across all indicators.</p> <p>MD describes a percentile ranking system involving only the ‘all student’ group that will be used to assign schools two stars to five stars with different proportions of the state schools in the five and two star categories (15% each) than the four and three star categories (35% each). Since the one-star category is used for schools identified for support in sections A.4.vi.a-c, these schools will have two different star designations. Performance results for each student group will be reported, but not used in the percentile rankings to identify the lowest performing schools.</p> <p>MD does not provide information on which schools will be ranked together or if all schools in the state will be ranked together. Ranking all the schools together would require justification for comparing differentiation scores with different components for elementary versus middle versus high school.</p> <p>The plan lacks specific information on how the indicators will be combined to create one total score out of a possible 100 points.</p> <p>The plan provides a table illustrating the potential total differentiation score and its corresponding potential percentile ranking among schools (bottom p. 32) suggesting there will be no way to directly convert between a school’s differentiation score and its percentile rank in a given year. The plan provides no data about the potential distribution of the differentiation scores to justify a continuous set of scores, rather than a distribution with gaps between groups of schools.</p> <p>MD’s system of annual meaningful differentiation is complex and will, most likely, confuse stakeholders who are not versed in such complex calculations. A state’s system of determining if schools and LEAs are meeting the goals set forth by the SEA should be easy for stakeholders to understand. Perhaps the public facing part of MD’s system is easy to understand--5 stars means an LEA is doing great; 1 star means it is not—but the calculations behind the stars are not.</p>
<i>Did the SEA meet all requirements?</i>	<p><input type="checkbox"/> Yes (# peer reviewer(s))</p> <p><input checked="" type="checkbox"/> No (4 peer reviewer(s))</p>

<p><i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i></p>	<p>MD must assure that the state accountability system differentiates based upon all students and each student subgroup.</p> <p>MD must clarify how the equity gap calculation is used to differentiate schools. If the calculation is used for differentiating schools, MD must also clearly describe the methodology of this calculation and how it factors within the state’s accountability system.</p>
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A.4.v.b: Weighting of Indicators

- Does the SEA describe the weighting of each indicator in its system of annual meaningful differentiation, including how the weighting is adjusted for schools for which an indicator cannot be calculated due to the minimum number of students (e.g., for the Progress in Achieving English Language Proficiency indicator)?
- Do the Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators each receive substantial weight individually?
- Do the Academic Achievement, Other Academic, Graduation Rate, and Progress in Achieving English Language Proficiency indicators receive, in the aggregate, much greater weight than the School Quality or Student Success indicator(s), in the aggregate?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>The MD plan indicates the state is studying the assignment system of scores for all indicators, suggesting anything approved now may or may not be what is used in the actual scoring and ranking of schools after 2018 results are collected and analyzed (p. 30).</p> <p>The plan provides multiple ways for describing the weighting of the different indicators in the differentiation score, creating potential confusion in how the state intends to calculate the differentiation score.</p> <p>MD meets this requirement for elementary and middle schools with a total of 65 percent given for the indicators of academic achievement, other academic, and progress in achieving EL proficiency and a total of 35 percent for the SQ/SS indicator.</p> <p>MD fails to meet the requirement for high schools with only 45 percent for academic achievement, other academic, and progress in achieving EL proficiency and a total of 55 percent for the SQ/SS indicator.</p>
<i>Strengths</i>	<p>MD describes the weighting of each indicator (p 31), differentiating between elementary/middle and high school. Measures that do not meet the minimum n-size will be removed from the calculation. The academic measures receive – in the aggregate – much greater weight than the student success indicator.</p> <p>MD provided a summary of each measure/indicator in Appendix D. On page 100, a future measure is introduced (K-3 progress), though the weight will be determined later.</p>
<i>Weaknesses</i>	<p>With so many measures, there is concern about whether each individual measure receives substantial weight. This is especially true for measures set at the 10% threshold (e.g. school climate, progress towards English proficiency,</p>

	<p>access to curriculum).</p> <p>The plan contains conflicting verbiage for the “credit for completion” indicator. On page 23, it mentions for elementary/middle school that the “percent of 5th grade students passing...,” and on page 97, it states “percent of 5th grades students enrolled...” The same concern is true for 8th graders.</p> <p>The MD plan does not consistently label all the components of the various indicators in the multiple tables (3 tables on pp. 30-32 and Appendix D on pp. 93-103) explaining the weighting used for the differentiation score.</p> <p>There are inconsistencies in terminology across the multiple tables that contain the high school additional indicator ‘f’ which causes confusion (particularly with respect to the tables on page 30, 32 and p 95 in appendix D).</p> <p>MD failed to meet the requirement of “much greater weight” for high schools, with only 45 percent for academic achievement, other academic, and progress in achieving EL proficiency which leaves a total of 55 percent for the SQ/SS indicator.</p> <p>Reliability and validity compounds concerns over non-academic indicators receiving greater weight in the aggregate (a.4.iv.e)</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer(s)) <input checked="" type="checkbox"/> No (3 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MD must demonstrate how the state plan provides much greater weight to academic achievement, other academic, graduation rate and progress in achieving English Language Proficiency for high schools

A.4.v.c: If Applicable, Different Methodology for Annual Meaningful Differentiation

- If the SEA uses a different methodology or methodologies for annual meaningful differentiation than the one described in 4.v.a of the State’s plan for schools for which an accountability determination cannot be made (e.g., P-2 schools), does it describe the different methodology or methodologies, including how the methodology or methodologies will be used to identify schools for comprehensive or targeted support and improvement?
- Does the SEA’s description of a different methodology indicate the type(s) of schools to which it applies?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MD describes a logical way to assign a differentiation score to schools that have no tested students, but does not consider all the possible variations of a one-to-one relation between the feeder school and the school with an earned differentiation score. To strengthen this section of the plan, evidence of only a one-to-one relation would justify this approach.</p> <p>MD has set forth a system for meaningfully differentiating for schools that do</p>

	not give state assessments (P-2 schools). MD will assign these schools the accountability determination of the school receiving the students; i.e. the school that has a tested grade such as 3rd grade.
<i>Strengths</i>	<p>The state shifts tested data from third grade performance back onto the state's 16 P-2 schools such that data are reported for both the sending and current school.</p> <p>This is a commonly used practice that holds the educators in the system accountable for success of all students within the system.</p>
<i>Weaknesses</i>	The state's sixteen P-2 schools will be assigned the differentiation score of the school their students attend after leaving the P-2 school, yet the plan provides no information about the score for P-2 schools who are feeder schools to more than one elementary school, each with their own differentiation score.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.vi: Identification of Schools (ESEA section 1111(c)(4)(D), 1111(d)(2)(C)-(D))

A.4.vi.a Comprehensive Support and Improvement Schools—Lowest Performing

- Does the SEA describe its methodology to identify not less than the lowest-performing five percent of all schools receiving Title I, Part A funds in the State for comprehensive support and improvement including, if applicable, how it averages data (e.g., does the State use a uniform averaging procedure across all schools)?
- Does the SEA's methodology result in the identification of not less than the lowest-performing five percent of all schools receiving Title I, Part A funds in the State for comprehensive support and improvement?
- Does the SEA include the year in which it will first identify these schools for comprehensive support and improvement (i.e., does the timeline comply with the Department's guidance)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MD's plan follows federal guidelines for identifying comprehensive support and improvement schools; however, no clear methodology is presented which causes concern since many of the measures are currently being developed.</p> <p>MD will rely on the 2016-2017 and 2017-2018 data to identify its first cohort of Comprehensive Support and Improvement Schools (CSI). During the 2018-2019, MD will identify its lowest performing 5% of Title I school. Identification of CSI will occur every three years.</p> <p>MD's plan infers a process to be used for identifying the lowest performing five percent of Title I schools, rather than specifically describing a comprehensive methodology for identifying the schools. Many of the scores and components suggested for use in compiling a differentiation score are still</p>

	being studied and not specifically defined in the plan, resulting in many pieces of the process yet to be defined. The plan needs to provide a specific methodology for identifying schools needing support, even if the prior scores details are not available at this time.
<i>Strengths</i>	MD provides a timeline for naming the first cohort of low performing Title I schools under the ESSA plan, including reference to the use of two years of data to determine the schools. The first cohort will be identified after the 2018 data is available with the process repeated every three years.
<i>Weaknesses</i>	<p>The calculation is based on the performance of the ‘all students’ group, which will mask potential equity concerns.</p> <p>The selection of the lowest performing five percent of Title I schools uses the percentile rank of schools’ differentiation score for the ‘all student’ group (table bottom p. 32), yet provides no information about what schools are being included in the percentile ranking process. The percentile rank could be derived from all schools in the state (used for determining a school’s star rating), leaving the threshold cut score to vary from year to year, or the percentile rank could be re-calculated for just the Title I schools, making the threshold cut score 5% or lower each year.</p> <p>The plan does not describe how the methodology will use two years of data to determine the low performing Title I schools. The plan does not discuss how prior year data is being used to help study and refine the process.</p> <p>The plan lacks available data for the SQ/SS, survey, and growth measures.</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>MD must provide information on how it will make a determination in the 2018-2019 school years given the lack of available data.</p> <p>MD must provide a detailed methodology that describes how multiple years of data are combined to determine how the overall score will be calculated.</p>

A.4.vi.b: Comprehensive Support and Improvement Schools—Low Graduation Rates

- Does the SEA describe its methodology to identify all public high schools in the State failing to graduate one-third or more of their students for comprehensive support and improvement, including: 1) a description of whether the SEA uses one or more extended-year adjusted cohort graduation rates in addition to the four-year adjusted cohort graduation rate and 2) if applicable, how the SEA averages data (e.g., does the State use a uniform averaging procedure across all schools)?
- Does the SEA’s methodology result in the identification of all public high schools in the State failing to graduate one-third or more of their students for comprehensive support and improvement?
- Does the SEA include the year in which it will first identify these schools for comprehensive support and improvement (i.e., does the timeline comply with the Department’s guidance)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MD will identify all public high schools that fail to graduate one third or more of their students based upon the four-year cohort rate beginning in 2018-2019 as schools for Comprehensive Support and Improvement. MD will identify these schools every three years using two years of available data with the 2016-2017 and 2017-2018 graduation data as the basis for the initial identification.</p> <p>The plan expects stakeholders to infer the methodology to be used for identifying the schools with graduation rates under 67%. The methodology details need to be incorporated in the plan to ensure stakeholders that all high schools not meeting the 67% threshold are identified for support. Knowing the process for selection will support the actions to be implemented for supporting the identified schools.</p>
<i>Strengths</i>	The state provided a timeline, starting in 2018, for identifying the high schools whose graduation rates are less than 67% with the process occurring every three years.
<i>Weaknesses</i>	<p>There is no methodology to help stakeholders understand how the two years of data will be combined and used to determine CSI high schools based on low graduation rates.</p> <p>The graduation indicator discusses the use of both the four-year and five-year adjusted cohorts, yet identification of schools with low graduation rates is based on only the four-year adjusted cohort. The plan would be strengthened by explaining why only the four-year cohort will be used for identifying schools.</p> <p>The state does not clearly indicate that it will identify these schools by 2018-2019</p>
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MD must provide the methodology it will use to identify high schools that fail to graduate one third or more of their students based upon the four-year cohort graduation rate.

A.4.vi.c: Comprehensive Support and Improvement Schools—Additional Targeted Support Not Exiting Such Status

- Does the SEA describe its methodology to identify schools receiving Title I, Part A funds that have received additional targeted support under ESEA section 1111(d)(2)(C) (*i.e.*, based on identification as a school in which the performance of any subgroup of students, on its own, would lead to identification as one of the lowest-performing five percent) that have not satisfied the statewide exit criteria for such schools within a State-determined number of years?
- Does the SEA’s methodology result in the identification of such schools?

- Does the SEA include the year in which it will first identify these schools for comprehensive support and improvement (*i.e.*, does the timeline comply with the Department’s guidance)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	MD assumes stakeholders can infer the methodology to be used for identifying schools needing additional targeted support, rather than providing a specific methodology. Without a well-defined methodology for identifying schools, the state does not provide evidence it will be correctly identifying schools in need of additional support in a timely manner to impact student learning. The lack of details also has the potential for creating an uncertain support environment for schools since their needs are not clear during the identification process.
<i>Strengths</i>	Schools that have been provided targeted support for three consecutive years and fail to make improvements will be considered chronically low-performing.
<i>Weaknesses</i>	While MD broadly explains on page 34 their actions, there is no clear methodology that delineates specific action steps the state will implement. The plan indicates two different groups of schools will be identified for additional targeted support: 1) schools previously identified as part of the lowest performing five percent of Title I schools who are not meeting exit criteria, and 2) schools with identifiable low performing student groups. The methodology for identifying the first group is inferred from information found in other sections of the plan, yet not directly addressed in this section. The methodology for identifying the second group is not stated in the plan; the plan provides a brief description of the criteria for the group (p. 34) and allows stakeholders to infer the process to be used for identifying specific schools that fit the criteria.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MD must explain the methodology it will use to identify schools needing additional targeted support.

A.4.vi.d: Frequency of Identification

- Does the SEA include the frequency with which the State will identify each type of school for comprehensive support and improvement after the first year of identification?
- Does the SEA’s timeline result in identification of these schools at least once every three years?

	<i>Peer Response</i>
<i>Peer Analysis</i>	MD’s existing SIG schools will be included in the 2018-2019 CSI school lists. After CSI schools have been identified, re-identification will occur once every three years. TSI schools will be identified beginning 2021-2022; subsequent TSI schools will be identified once every three years.
<i>Strengths</i>	Schools will be identified for targeted support once every three years

	<p>following initial identification in 2021. Schools will be identified for comprehensive support beginning in 2018-19 and thereafter once every three years.</p> <p>The MD plan states the frequency with which schools will be identified for support: a) schools receiving CSI will be identified every three years, starting in 2018-19, and b) schools receiving TSI will be identified every three years, starting in 2020-21 which is the same year the second cohort of CSI schools will be identified.</p> <p>MD will include three types of schools: 1) the lowest performing five percent of Title I schools based on two years of data; 2) high schools with a four-year cohort graduation rate of less than 67 percent; and 3) existing School Improvement Grant schools [these grants end in 2020-2021].</p>
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.vi.e: Targeted Support and Improvement Schools—“Consistently Underperforming” Subgroups

- Does the SEA describe its methodology to identify schools with one or more “consistently underperforming” subgroups of students, including its definition of “consistently underperforming”?
- Does the SEA’s methodology result in the identification of any school with one or more “consistently underperforming” subgroups of students?
- Is the methodology based on all indicators in the statewide system of annual meaningful differentiation?
- Does the SEA identify these schools annually?

<i>Peer Response</i>	
<i>Peer Analysis</i>	<p>The MD plan infers that stakeholders know the methodology which will be applied to identify the consistently underperforming schools, rather than providing specific details including example calculations and selection.</p> <p>A description of the methodology would assist stakeholder in deepening their understanding of the definition of a consistently underperforming school and potentially developed local strategies for internally identifying, and supporting, these schools prior to state identification.</p>
<i>Strengths</i>	<p>Schools with a subgroup that fail to meet performance targets over two years based on all indicators will be identified as consistently underperforming. Annual identification will begin in 2019.</p>
<i>Weaknesses</i>	<p>The plan lacks details regarding the calculation using two years of</p>

	underperformance data.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MD must provide a clear methodology that shows how multiple years of data are combined. To ensure the methodology results in identification of consistently underperforming subgroups.

A.4.vi.f: Targeted Support and Improvement Schools—Additional Targeted Support

- Does the SEA describe its methodology to identify schools in which the performance of any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State’s methodology under ESEA section 1111(c)(4)(D) (*i.e.*, the methodology described above in A.4.vi.a), including: 1) whether the methodology identifies these schools from among all public schools in the State or from among only the schools identified as schools with one or more consistently underperforming subgroups and 2) if applicable, how the SEA averages data (*e.g.*, does the State use a uniform averaging procedure across all schools)?
- Does the SEA’s methodology result in identification of such schools?
- Does the SEA include the year in which the State will first identify such schools (*i.e.*, does the timeline comply with the Department’s guidance)?
- Does the SEA include the frequency with which the State will identify such schools after the first year of identification?

	<i>Peer Response</i>
<i>Peer Analysis</i>	MD’s response on pages 35-36 includes identifying additional targeted support for schools with low-performance and consistently underperforming subgroups. The initial identification is 2018-2019, subsequent identification occurs once every three years. The MD plan does not describe the methodology the state plans to use in identifying the schools that will receive additional targeted support. The development of a clear description of the methodology has the potential to clarify the confusing information currently in this section. The clarification of how schools will be identified for additional targeted support will also provide direction for the additional targeted support.
<i>Strengths</i>	
<i>Weaknesses</i>	Based on MD’s response, it is unclear if the state is actually referencing two distinct groups of schools that will be identified for additional targeted support. Specifically, the MD plan does not include the methodology used to identify schools that receive additional targeted support. The opening statement implies a school must be identified for TSI before it is eligible for consideration to receive additional targeted services, yet the closing paragraph does not require schools to be previously identified as TSI. Also, the first paragraph indicates the data to be used for identification will be the sum of two indicators, academic achievement and academic progress, while the final paragraph indicates the data will be the sum of all the indicators. The

	information provided in this section of the plan suggests there may be different groups who will be identified for additional targeted support.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MD must clearly describe the methodology to identify schools for additional targeted support.

A.4.vi.g: If Applicable, Additional Statewide Categories of Schools

- If the State chooses, at its discretion, to include additional statewide categories of schools, does the SEA describe those categories?

	<i>Peer Response</i>
<i>Peer Analysis</i>	MD will include an additional statewide category of schools: the state will identify the lowest performing 5% from all Title I schools. Non-Title I lowest performing schools will receive differentiated support. No time line or description of support was provided. (page 36) The plan shows how MD will develop a comprehensive structure to be inclusive of all schools in the state regardless of their status in receiving Title I funds. Though differentiated support will be provided, the addition of all public schools shows the state's commitment to a comprehensive, inclusive improvement system which will require all schools to focus on changing student learning.
<i>Strengths</i>	MD will identify the lowest five percent of all schools in the state, not just title I schools and provide differentiated support to non-Title I schools that fall into this category. Identification is based on all indicators on the accountability system. Identification of all schools, regardless of Title I identification, sends a strong message to the state's stakeholders that the SEA is ready and poised to support the success of all schools and students.
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.4.vii: Annual Measure of Achievement (ESEA section 1111(c)(4)(E)(iii))

- Does the SEA describe how it factors the requirement for 95 percent participation of all students and 95 percent of all students in each subgroup of students in statewide mathematics and reading/language arts assessments into the statewide accountability system?
- If applicable, does the SEA describe how the SEA differentiates its approach based on such factors as the number of subgroups in the school missing the participation rate requirement, the length of time over which the school has missed the requirement, or the degree to which the school missed the requirement (*e.g.*, 92 percent participation rate vs. 70 percent participation)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	MD’s response to the requirement for 95 percent participation of all students and all subgroups on the statewide math and reading/language arts assessments was very confusing. As written on page 36, “For schools that fail to achieve 95 percent participation, any student below the 95 percent threshold will be counted as ‘not proficient’ in the calculation of the proficiency rates even though they did not take the exam.” It is unclear what “any student below the 95 percent threshold” means.
<i>Strengths</i>	
<i>Weaknesses</i>	MD reiterates the ESSA guidance related to the requirement that 95 percent of the tested grades’ student population participates in the assessment process, rather than providing information on how the accountability system will use each school’s participation rates in the process of identifying or ranking schools.
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input checked="" type="checkbox"/> No (4 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MD must provide a clear set of business rules for how the 95 percent participation rate will be determined and used in the accountability system.

A.4.viii: Continued Support for School and Local Educational Agency Improvement (ESEA Section 1111(d)(3)(A))

A.4.viii.a: Exit Criteria for Comprehensive Support and Improvement Schools (ESEA section 1111(d)(3)(A)(i)(I))

- Does the SEA describe its statewide exit criteria for schools identified for comprehensive support and improvement, which may include how the exit criteria are aligned with the State’s long-term goals and measurements of interim progress?
- Does the SEA’s description include the number of years within which schools are expected to meet such criteria?
- Is the number of years no more than four years?
- Do the exit criteria ensure continued progress to improve student academic achievement and school success in the State (*e.g.*, do the exit criteria improve student outcomes and ensure that a school that exits no longer meets the criteria under which the school was identified)?

	<i>Peer Response</i>
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<p><i>Peer Analysis</i></p>	<p>The MD plan is confusing when discussing the exit criteria for CSI schools; the types of schools being exited under this section do not correspond to the three types of schools listed in a prior section as CSI schools. However, the state’s expectation of two consecutive years of improvement starts the schools on a path for sustaining progress.</p> <p>The suggested exit criteria is unclear as well as unrealistic for low performing schools struggling with academic performance or graduation rates. As the state works to refine and clarify the exit criteria, the MD plan would be strengthened with information showing the exit criteria is fair and equivalent for all schools in a category.</p> <p>Schools that meet targets for two consecutive years are eligible to exit and may exit if the school is no longer in the bottom five percent and meets targets for two consecutive years. Schools with low graduation rate will exit once the rate is higher than 67 percent for two consecutive years. Chronically low performing schools will exit when all student subgroups perform above the average of schools in the lowest 5 percent for two consecutive years. These schools have three years to achieve this. These schools will develop action plans and be monitored; schools failing to make progress will be subject to more rigorous interventions.</p>
<p><i>Strengths</i></p>	<p>MD sufficiently described their exit criteria for CSI schools.</p> <p>MD will require the CSI schools to develop a sustainability plan prior to exiting the support.</p>
<p><i>Weaknesses</i></p>	<p>MD’s description of exit criteria in the section is confusing since schools identified for TSI are included, i.e., schools with chronically low performing subgroups (see description p. 35). Based on the list of schools receiving CSI (p. 34), the exit criteria for CSI needs to include: a) the current cohort of schools identified as the bottom five percent of Title I schools, b) high schools identified with graduation rates below 67% for all students, and c) the SIG schools.</p> <p>In order to exit, schools identified for CSI will meet state targets as well as no longer meet identification criteria. The plan does not indicate which identification criteria, the differentiation score threshold used when the school was identified or the differentiation score threshold being used to identify the next cohort. The requirement to meet state targets, which statistically has a low probability, does not indicate whether it is just for the ‘all student’ group or for every student group, with at least 10 students tested, in the school, – which would result in different criteria for different schools. A school with a diverse student population would need to meet at least 10 different state targets while another school might only need to meet one or two state targets.</p> <p>The CSI high schools identified for low graduation rates have a clearly identified graduation rate threshold for exit, but the plan is not clear which student groups must meet the threshold or whether both the four-year adjusted cohort and the five-year adjusted cohort must meet the threshold.</p>

<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewer(s)) <input checked="" type="checkbox"/> No (1 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>MD must clarify whether the exit criteria is different from the criteria used for initial identification.</p> <p>MD should clearly describe the determination for how the threshold (e.g. accountability indicators or components, targets) for which schools will be evaluated against when it determines if a school meets the exit criteria. MD should show strong alignment between the exit criteria and the entry criteria.</p>

A.4.viii.b: Exit Criteria for Schools Receiving Additional Targeted Support (ESEA section 1111(d)(3)(A)(i)(II))

- Does the SEA describe its statewide exit criteria for schools receiving additional targeted support under ESEA section 1111(d)(2)(C), which may include how the exit criteria align with the State’s long-term goals and measurements of interim progress and the requirement that the goals and measurements of interim progress take into account the improvement necessary to close statewide proficiency and graduation rate gaps?
- Does the SEA’s description include the number of years within which schools are expected to meet such criteria?
- Do the exit criteria ensure continued progress to improve student academic achievement and school success in the State (e.g., do the exit criteria improve student outcomes for the subgroup or subgroups that led to the school’s identification and ensure that a school that exits no longer meets the criteria under which the school was identified)?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>According to information on page 37, additional targeted support schools will exit their status if they no longer meet the identification criteria. Once identified as an additional TSI, school leaders develop and implement improvement plans Low performing student subgroup additional targeted support schools will be reclassified as CSI if they fail to meet exit criteria in three years Consistently underperforming student group TSI schools will be subject to more rigorous interventions if they fail to exit after two years.</p> <p>The MD plan logically identifies a shorter time frame for exit from TSI compared to CSI since the identification criteria and exit criteria are lower. Schools in TSI may be confused by the purpose of exiting schools from support prior to identification of the next cohort, 2 years and 3 years respectively. The plan would be strengthened by describing how the continuous support process works when there seems to be a gap in delivery of services.</p> <p>MD will allow schools receiving additional targeted support to exit once school leaders have demonstrated that significant progress has been made toward meeting the annual targets for two consecutive years. As with the comprehensive support and improvement schools, a sustainability plan will be required.</p> <p>Schools identified for targeted support and improvement will have three years to meet the state’s exit criteria. Schools that do not meet the exit criteria will be moved to comprehensive support and improvement (p 37).</p>

<i>Strengths</i>	<p>Schools will develop action plans and be monitored; schools failing to make progress will be identified as a CSI school and be subject to more rigorous interventions by the LEA.</p> <p>Schools must demonstrate that significant progress has been made for meeting annual targets for two consecutive years in order to exit.</p>
<i>Weaknesses</i>	<p>MD did not provide a description of “benchmarks” or the definition of “significant progress”.</p> <p>The MD plan has single exit criteria, no longer meeting identification criteria, a threshold which changes from cohort to cohort. The plan does not specify whether it is the threshold a school was identified under or the current threshold. Since the schools in TSI are being identified every three years, yet the schools have only 2 years to meet exit criteria, there seems to be a lack of alignment between identification and exit.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer(s)) <input checked="" type="checkbox"/> No (3 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>MD must describe how the exit criteria ensure continued progress, such as by clearly describing the benchmarks and providing a definition for “significant progress”.</p>

A.4.viii.c: More Rigorous Interventions (ESEA section 1111(d)(3)(A)(i)(I))

- Does the SEA describe the more rigorous State-determined action required for schools identified for comprehensive support and improvement that fail to meet the SEA’s exit criteria within a State-determined number of years, which may include interventions that address school-level operations, such as changes in school staffing and budgeting or the school day and year?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MD’s plan vaguely describes the state’s strategy for implementation of more rigorous interventions to support schools in CSI who are struggling to meet exit criteria. The state’s strategy increases the amount of external support provided to school leaders, rather than instructional staff, and focuses on surface infrastructure changes within the school. The plan would be strengthened with discussion of implementation of evidence-based instructional practices designed to change root causes of low student achievement, supported by a strong, ongoing evaluation system carried out by local school staff; external staff would be used in a direct coaching role with instructional staff and leaders who would be the primary decision makers.</p> <p>The Maryland State Department of Education will take the lead on intervening with schools that fail to meet the exit criteria within three years of identification. An</p>

	<p>external stakeholder group (selection and membership not defined) will be convened to review the root cause analysis and revise the action plan for the school. MD states on page 37 that significant staffing, scheduling, and programmatic changes will occur as a result of the revised action plan.</p> <p>Resources will be made available to these schools through leadership coaches for principals; targeted professional learning for principals, assistant principals, and teacher leaders; monthly on-site visits with collaborative debriefs; quarterly fiscal reviews; and distribution of funds based on a different formula.</p>
<i>Strengths</i>	<p>Based on a root cause analysis, significant changes in the school's staffing, scheduling and programming will be made. Principals will be required to use coaches from the department and monthly on-site visits will occur along with quarterly fiscal reviews, with funding based on outcomes of these reviews.</p> <p>MD will work with schools to identify why problems exist and schools are not being successful. A variety of interventions/strategies may be implemented to better support struggling schools.</p> <p>MD will lead the intervention efforts and provide a variety of resources to assist the schools that fail to meet the state's exit criteria.</p>
<i>Weaknesses</i>	<p>MD does not specifically identify evidence-based instructional strategies, rather it focuses on infrastructure. The plan suggests the rigorous interventions involve external school staff making decisions for schools as well as requiring school and district leaders to participate in required professional development. The plan lacks details of data-driven decision making using root cause analysis or involvement of instructional staff in the rigorous interventions, which may or may not have high impact on student learning.</p> <p>The membership of the external stakeholder group was not provided.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewer(s)) <input checked="" type="checkbox"/> No (1 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>MD should describe more rigorous state-determined action (e.g. provide actionable data driven decision making process for building a school's internal capacity to identify and implement evidence-based instructional strategies with significant impact on student learning that will have a positive effect on the root causes of the low student achievement).</p>

A.4.viii.d: Resource Allocation Review (ESEA section 1111(d)(3)(A)(ii))

- Does the SEA describe how it will periodically review resource allocation to support school improvement in each LEA in the State serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement?

	<i>Peer Response</i>
<i>Peer Analysis</i>	MD mentions on page 38 that a review of resource allocation will be part of the school's root cause analysis and monitoring process. Based on the

	<p>comments, resource allocation reviews appear to be limited to funds.</p> <p>MD’s plan lacks a consistent process for evaluating the equitable allocation of resources to ensure results can be analyzed against the state’s prioritized allocation expectations. Since the plan directly mentions funds, stakeholders could potentially assume the state is not concerned about other resources such as access to quality teachers or access to rigorous, well-rounded curriculum which is one of the measures weighted at 10% in the school differentiation score. Expecting local school leaders, in CSI or TSI, to identify and implement, on their own timeline, a process for evaluating their allocation of resources may be stretching local expertise and time beyond their capacity when they are extending their work to accelerate improvement of student learning. The SEA ESSA plan needs to facilitate a consistent assessment of all resource allocation.</p> <p>All LEAs complete a monthly spenddown report and a summative fiscal report for the Maryland State Department of Education (MSDE). LEAs with schools identified for comprehensive or targeted support and improvement must address resource allocations through the root cause analysis and monitoring process. Maryland gives a brief mention that they will prioritize allocations based on need and the use of evidence-based strategies with strong accountability measures (p 38) but no specifics were included in the Consolidated Plan.</p>
<i>Strengths</i>	<p>Resource review will occur and LEA leaders will be expected to develop strategies that address resource inequities in CSI and TSI schools. There is also a review and monitoring process.</p> <p>MD gives mention to prioritizing plans based on evidence-based strategies with strong accountability measures; however, it falls short of explaining how this prioritization will take place.</p>
<i>Weaknesses</i>	<p>The state’s response is limited to financial resources and does not address access to curriculum, highly effective staff, funding, etc. Few details were provided about the state’s monitoring and evaluation process.</p> <p>MD’s plan suggests each LEA superintendent and school principals will be responsible for identifying and implementing a methodology for assessing if the allocation of resource is equitable across schools and student populations. The plan suggests the local resource allocation will need to be compared against the state’s prioritized expectations for resource allocation with a focus on allocation of funds, rather than all resources.</p>
<i>Did the SEA meet all requirements?</i>	<p><input checked="" type="checkbox"/> Yes (1 peer reviewer(s))</p> <p><input checked="" type="checkbox"/> No (3 peer reviewer(s))</p>
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>MD must more clearly describe its periodic review of resource allocation.</p>

A.4.viii.e: Technical Assistance (ESEA section 1111(d)(3)(A)(iii))

- Does the SEA describe the technical assistance that it will provide to each LEA in the State serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement?
- Is the technical assistance likely to improve student outcomes by, for example, 1) identifying State-approved evidence-based interventions; 2) supporting LEAs and schools in the development and implementation of support and improvement plans; and 3) differentiating the technical assistance?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Some peers thought MD’s response adequately addresses the criteria on pages 38-40. MD uses a well-researched school improvement framework. The required actions for CSI and TSI schools listed are aligned to many best practices implemented by turnaround schools.</p> <p>MD’s technical assistance plan for schools identified for CSI or TSI was to be based on a framework that reflected the lessons learned from school improvement under NCLB. The state’s attempt to move theory to practice in a statewide model of technical assistance may be based on a misinterpretation of the framework. The state’s technical assistance model would be strengthened by focusing on facilitating, coaching, and/or supporting local instructional and leadership staff as they collaborate and apply their professional expertise and knowledge, including local student needs, to accelerate learning related to the state academic standards for all students. The restructuring to better align the technical assistance model might benefit from integrating the research and impact of teacher efficacy with the rapid school improvement framework.</p> <p>Schools identified for comprehensive and targeted support and improvement will be required to complete a needs assessment (developed by MSDE) and have a root cause analysis conducted by a third party. Once this has been completed, the LEA will include various stakeholders in a discussion of the needs assessment and root cause analysis. The development of an action plan that includes evidence-based interventions will then take place.</p> <p>MSDE will provide differentiated technical assistance based on the specific needs of each school as identified in the needs assessment and root cause analysis around the four domains of the school improvement framework (turnaround leadership, talent development, instructional transformation, and culture shift). Comprehensive support and improvement schools will be required to use English language arts and mathematics curriculum that has been vetted (not defined) by the MSDE. Professional development will be around the specific evidenced-based strategies as outlined in the action plans with additional attention to the growth of effective leaders. Community partnerships and collaboration will be required (pgs39-40).</p>
<i>Strengths</i>	<p>The state has a framework for school improvement. Based on this framework, each LEA must come up with an action plan for how it will support the CSI and TSI schools. The state will develop a resource hub. CSI schools must use vetted curriculum. PD for culture shift and cycles of professional learning will occur. All TSI and CSI schools will establish a network of community partners that support social needs at the school.</p>

	<p>MD provided summaries of actions that will be executed as the state implements its improvement framework.</p> <p>The state’s intent to use the Four Domains of Rapid School Improvement recently released by West Ed suggests technical support will be guided by a comprehensive framework for school improvement that reflects the lessons learned from the initial work with the school improvement process.</p> <p>The Center for School Turnaround at WestEd is an excellent resource.</p>
<i>Weaknesses</i>	<p>The state’s plan discussion about the importance of community involvement and community schools does not align with the Four Domains of Rapid School Improvement framework, including external stakeholder involvement in the decision-making process.</p> <p>The state plan shows the first two domains, turnaround leadership and talent development, were combined suggesting a misunderstanding of what was meant by talent development. Talent development is one-third about leadership and two-thirds, or more, about development of turnaround teachers and model teachers, key to the expertise needed for the development and implementation of effective plans of evidence-based instructional strategies.</p> <p>MD’s plan discussion of the needs assessment and root cause analysis is about what LEAs will do, rather than the technical support to be provided by the state to facilitate the quality of these processes by local staff. The plan reference to the needs assessment and root cause analysis being done by an external team will not provide an accurate identification of school needs and the root cause of low student achievement. Root cause analysis requires primary involvement of local instructional staff to efficiently and appropriately identify and prioritize the potential root causes of student learning, rather than a diverse group of community stakeholders who tend to focus on surface, publicly observable concerns.</p> <p>No specifics were provided related to the selection or membership of the third party conducting the root cause analysis.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewer(s)) <input checked="" type="checkbox"/> No (2 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>MD must review the Four Domains of Rapid School Improvement framework and restructure the technical assistance plan to align with research and the framework to increase the likelihood of improving student outcomes.</p>

A.4.viii.f: If Applicable, Additional Optional Action

- If applicable, does the SEA describe the action that it will take to initiate additional improvement in any LEA with a significant number or percentage of schools that it consistently identifies for comprehensive support and improvement and are not meeting the State’s exit criteria or in any LEA

with a significant number or percentage of schools implementing targeted support and improvement plans?

	<i>Peer Response</i>
<i>Peer Analysis</i>	Not applicable
<i>Strengths</i>	
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input type="checkbox"/> Yes (# peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s)) N/A (4)
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.5: Disproportionate Rates of Access to Educators (ESEA section 1111(g) (1) (B))

- Does the SEA describe the extent, if any, which low-income children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, which may include the State definition of ineffective, out-of-field, and inexperienced teachers?
- Does the SEA describe the extent, if any, that minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, which may include the State definition of ineffective, out-of-field, and inexperienced teachers?
- Does the SEA describe the measures (*e.g.*, data used to calculate the disproportionate rates) that it will use to evaluate and publicly report its progress with respect to how low-income and minority children are not served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers?⁴

	<i>Peer Response</i>
<i>Peer Analysis</i>	MD’s response on pages 40-41 includes data by category measure and rate. The state uses a 5% threshold model to determine significant gaps. There appears to be issues with low income children being taught by out-of-field teachers and/or inexperienced teachers. There is a disproportionate percent of students of color being taught by ineffective teachers, out-of-field teachers, and/or inexperienced teachers. MD is implementing strategies to eradicate these challenges. The state also shares these data with the public.

⁴ Consistent with ESEA section 1111(g)(1)(B), this description should not be construed as requiring a State to develop or implement a teacher, principal or other school leader evaluation system.

	<p>MD does not provide clear information on the extent of the disproportionality of ineffective, out-of-field, or inexperienced teachers for low-income or minority students in the state when information across the entire plan is compiled and interpreted. The plan reports only one of several different gaps which need to be considered for disproportionality and limiting the potential root cause which should be the focus of the SEA plan for decreasing teacher access disproportionality concerns.</p> <p>MD reports the disproportionality of low-income and minority children being served by ineffective, out-of-field, and inexperienced teachers on pages 40-42. The only definition provided was for inexperienced teachers which were defined as first year. No definitions were provided for ineffective or out-of-field.</p> <p>Statewide strategies to address the inequities were developed by the MSDE and LEAs through the review of best practices and research.</p> <p>Data will be reviewed by the MSDE on an annual basis and four separate reports are available on the MSDE website.</p>
<i>Strengths</i>	<p>The state shared data that shows ineffective, out of field, and inexperienced teachers in low performing schools remains a problem. Inexperienced = first year teacher. The state sets a gap of five percent. The state shares these data with their LEAs.</p> <p>MD conducts data and root cause analyses to identify disproportionality. Improvement strategies were developed in partnership with LEAs and review of best practices and current research.</p> <p>The SEA ESSA plan indicates the state uses multiple approaches for identifying disproportionality.</p> <p>MD relied on best practices and current research to develop strategies to address the inequities including research from the National Board Certification, The Education Trust, and the Mid-Atlantic Consortium.</p>
<i>Weaknesses</i>	<p>While the state is investigating strategies, it has not committed to a single equity strategy</p> <p>MD’s plan does not provide a clear definition of ‘ineffective teacher’ so stakeholders understand the potential effect of these teachers on student learning. The plan indicates “Ineffective teachers are primarily inexperienced staff in Title I, Part A schools.” (p. 55), yet this section has identified three different groups of teachers when talking about disproportionality (ineffective, out-of-field, inexperienced) which overlap based on the latter identification of ‘ineffective’ teachers. The plan uses the categories of ineffective and inexperienced somewhat interchangeably.</p> <p>The plan states the state has “slightly more than two percent of (state) teachers</p>

	rated ineffective” (p. 54) creating a conflict with the statement in this section that the “disproportionality between low-income and non-low-income children being taught by an ineffective teacher is 4.3 percent” (p. 40); this is statistically impossible.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.6: School Conditions (ESEA Section 1111(g)(1)(C))

- Does the SEA describe how it will support LEAs receiving assistance under Title I, Part A to improve school conditions for student learning?
- Does the SEA’s description include how it will support LEAs to reduce incidences of bullying and harassment?
- Does the SEA’s description include how it will support LEAs to reduce the overuse of discipline practices that remove students from the classroom?
- Does the SEA’s description include how it will support LEAs to reduce the use of aversive behavioral interventions that compromise student health and safety?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Stated on pages 42-44, MD works toward reducing incidents of bullying and harassment using a variety of strategies and interventions that include collaborating with internal and external stakeholders to identify and implement practices and programs.</p> <p>The plan provides a lengthy description of a statewide action plan to help schools improve conditions expected to lead to improved school climate and increased student achievement. The description identifies separate actions for each of the three components required.</p> <p>MD describes on pages 42-44 the multitude of resources they provide for <u>all</u> schools to ensure that schools are safe and healthy places. The state works with other agencies and organizations, such as the Center for Dispute Resolution, the Governor’s Opioid Operational Command Center, State Board of Education’s Mental Health subcommittee, and a statewide taskforce to put into place evidence-based programs to address the needs of students in the areas of positive behavioral supports, conflict resolution, anti-bullying, disproportionality of school discipline, restraint and seclusion, equity, mental health, and special education and other areas.</p>
<i>Strengths</i>	<p>MD offers a tiered approach to help LEAs create and sustain positive and supportive learning environments that promote student learning.</p> <p>MD outlines a multi-component, inter-related set of infrastructures to be</p>

	<p>available statewide for use by schools to address bullying/harassment, overuse of discipline practices that remove students from the classroom, and reduce use of aversive behavioral interventions. The plan suggests a multi-tiered system of support within each component and potential links across components.</p> <p>MD is to be commended for their proactive approach in addressing two of the most recent areas of concern in schools – human trafficking and the opioid epidemic.</p>
<i>Weaknesses</i>	<p>MD did not provide any data to show the need for any of the action steps listed in the plan.</p> <p>The state provides no evidence to justify the need for the actions outlined for each of the components. Few of the actions listed have scientific research to show implementation will change student learning in a positive way.</p> <p>The plan provides no data to justify the need for this extensive plan or to identify the root causes of the negative school conditions to be affected in the plan.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	

A.7: School Transitions (ESEA 1111(g)(1)(D))

- Does the SEA describe how it will support LEAs receiving assistance under Title I, Part A in meeting the needs of students at all levels of schooling (particularly students in the middle grades and high school)?
- Does the SEA’s description include how it will work with LEAs to provide effective transitions of students to middle grades and high school to decrease the risk of students dropping out?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MD describes how the state supports school districts that receive Title funds in meeting the needs of students. Much of the plan’s description focus on early childhood. Secondary support is provided through academic advisement, career exploration, enrollment in advanced courses, and participation in career/technical focused courses. The plan also highlights MSDE’s efforts in reducing dropout as well as support for students with disabilities; implementing transition programs for students entering grades 1, 6, and 9; adding support for EL; piloting an option to implement GED programs; and promoting enhanced family and community engagement.</p> <p>The plan provides a lengthy description (pp. 44 – 47) of actions to support transition through and from early child hood education programs to primary grades as well as transitions from middle to high school, but lacks strategies</p>

	<p>for transitions from primary to upper elementary to middle school which represents at least one-third of a student’s K-12 educational experiences. Without information of the actions supportive of transition through the middle years, the actions described are disjointed and incomplete.</p> <p>MD describes their efforts around school transitions on pages 44-47 of the Consolidated Plan and addresses all aspects of transition from early childhood to post-high school. As has been evident throughout MD’s Plan, the state has involved stakeholders and other agencies/organizations in putting together a cohesive and strategic transition plan for their students. MD’s Plan is grounded in evidence and best practices such as Reflective Coaching/Social Emotional Foundations for Early Learners, career clusters, 21st Century Community Learning Centers, GED Option Pilot Program for English learners, the Family and Community Engagement Outreach Program, and a robust parent portal.</p>
<p><i>Strengths</i></p>	<p>The state promotes collaboration and best practice.</p> <p>MD provides a broad spectrum of supports for LEAs that receive Title I funds.</p> <p>The plan gives a significant amount attention to the transition from birth to pre-kindergarten to the primary grades. The plan also provides support for transitioning through the later K-12 grades with an emphasis on career planning. The plan recognizes the need for parental involvement in the learning process to support students moving through the educational system.</p> <p>MD involved, and will continue to involve, a variety of stakeholders in putting together a transition plan that covers the span of education in the state from birth through post-high school.</p>
<p><i>Weaknesses</i></p>	<p>MD falls woefully short in using data to target interventions at key transition points.</p> <p>MD’s plan has no information on how it will support student transition from the primary grades through upper elementary to the early middle school grades.</p> <p>Most actions for the early childhood to primary grades transition, outlined in the SEA ESSA plan, are about what the early childhood educators will do with little engagement of the primary grade educational staff.</p> <p>MD provides a bulleted list of actions the state will take to ensure effective transitions and decrease drop-out rates (p. 46) without information on how the state decided these were the prioritized actions needed to support transition between grades and buildings. Some of the actions listed may be more appropriate in another section of the ESSA plan, e.g., technical assistance of evidence-based strategies to promote student engagement.</p> <p>A portion of the lengthy description discusses supporting students with disabilities and ELs, yet lacks any attention to transitioning students who exit these programs. The plan provides no mention of students from low socio-economic backgrounds. The guidelines do not require attention to these</p>

	transitions.
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (1 peer reviewer(s)) <input checked="" type="checkbox"/> No (3 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MD must provide a clear set of integrated SEA actions, inclusive of all grades PreK-12 that describe how the state will support LEAs with school transitions and dropout prevention.

SECTION E: TITLE III, PART A, SUBPART 1: ENGLISH LANGUAGE ACQUISITION AND ENHANCEMENT

E.1: Entrance and Exit Procedures (ESEA section 3113(b)(2))

- Does the SEA describe how it will establish and implement, with timely and meaningful consultation with LEAs representing the geographic diversity of the State, standardized statewide entrance and exit procedures for English learners, including a description of how, if applicable, a State will ensure that local input included in the exit procedures, such as teacher input or a portfolio, will be applied statewide?
- Does the SEA’s description include an assurance that all students who may be English learners are assessed for such status within 30 days of enrollment in a school in the State?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>MD’s plan lacks a description of the entrance and exit procedures applied in all LEAs for EL programs. The plan needs to provide sufficient information about the procedure to create transparency.</p> <p>MD requires that all students identified by the home language survey as EL’s are assessed no later than 30 days after the beginning of the start of school OR within two weeks of attendance if the student arrives after the start of the school year (p 62).</p> <p>Exit criteria for EL students are having attained English proficiency with a composite score of 5.0 on ACCESS for ELLs 2.0.</p>
<i>Strengths</i>	
<i>Weaknesses</i>	<p>MD’s response is too brief and lack details.</p> <p>The state’s plan indicates the state has “always” had a standardized entrance and exit process for ELs, yet provides no description of the process. The plan does provide a timeline for applying the entrance process, yet no details are available to describe those entrance steps or how the entrance information is used by LEAs in their EL program.</p> <p>MD did not provide any information as to any local input as to whether or not a student exits EL status. The only criterion described was that of a composition score of 5.0 on ACCESS for ELLs 2.0.</p>

<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (3 peer reviewer(s)) <input checked="" type="checkbox"/> No (1 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	MD should provide greater specificity around the exit process procedures.

E.2: SEA Support for English Learner Progress (ESEA section 3113(b)(6))

- Does the SEA describe how it will assist eligible entities in meeting the State-designed long-term goal for English language proficiency established under ESEA section 1111(c)(4)(A)(ii), including measurements of interim progress towards meeting such goal, based on the State’s English language proficiency assessment under ESEA section 1111(b)(2)(G)?
- Does the SEA describe how it will assist eligible entities in helping to ensure that English learners meet challenging State academic standards?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Stated on page 62, MD uses state meetings with 24 LEA EL supervisors to train them on effective practices and to discuss data analysis and the needs of ELs. During the state meetings LEA EL supervisors review PD they can bring back to their school district and train teachers, review program models and schedules, and review course curricular to ensure ELs have equitable access to the content. MD implemented summer training for EL teachers in the language arts and math content areas. Most of these actions list in the plan will occur from 2017 to 2018.</p> <p>MD’s plan provides generic statements about support to be provided in the current academic year, rather than a long-term vision of improving EL programming that will be sustainable at the end of the 13 years of this ESSA plan. In developing this long-term vision, the state may benefit from reviewing the distribution of students needing EL services across all grades, factoring in newcomers at each grade, to develop instructional strategies to decrease the number of long-term EL students who are struggling to meet the program exit criteria.</p> <p>MD provides support for EL progress to LEAs through a variety of resources, including statewide briefings, collaboration meetings, personalized mentoring, technical assistance, professional development, regional symposia, and direct technical assistance. During the current year (2017-2018), MD will focus the technical assistance on the new accountability system (p 62).</p>
<i>Strengths</i>	MD provides a variety of methods of support to the LEAs with attention to both personalized mentoring to regional meetings to statewide briefings.
<i>Weaknesses</i>	<p>MD’s response does not present a long-term process of support for helping LEAs meet long-term goals.</p> <p>The state’s plan identifies meetings for the 2018 academic year and lacks information on what will happen the remaining 12 years of the ESSA plan.</p>

	<p>The plan provides no information to suggest the content of the meetings will be the same or different than previous years.</p> <p>This section of the plan indicates the majority of ELs are enrolled in kindergarten through grade 2 (p. 62). The plan should include data showing the numbers and proportions of program students receiving EL services at each grade level from kindergarten through grade 12 accompanied by discussion about the characteristics of ELs being considered long-term ELs.</p> <p>The plan lacks information on how English language acquisition research will be focused on the prioritized concerns of the states 21 LEAs.</p> <p>The frequency of the statewide briefings was not identified.</p>
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (2 peer reviewer(s)) <input checked="" type="checkbox"/> No (2 peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	<p>MD must communicate a long-term process for assisting LEAs in meeting long-term goals. The process should focus on promoting English language acquisition (e.g. curriculum, instruction, assessment and usage of data)</p>

E.3: Monitoring and Technical Assistance (ESEA section 3113(b)(8))

- Does the SEA describe how it will monitor the progress of each eligible entity receiving a Title III, Part A subgrant in helping English learners achieve English language proficiency?
- Does the SEA describe the steps it will take to further assist eligible entities if the strategies funded under Title III, Part A are not effective, such as by providing technical assistance and support on how to modify such strategies?

	<i>Peer Response</i>
<i>Peer Analysis</i>	<p>Described on page 63, every three years 21 LEAs are monitored by the MSDE Education Program Specialists (2). The Specialists and LEAs collaborate to discuss monitoring protocols and implement technical assistance. Beginning in 2017-2018, monitoring visits will include identification and discussion of the needs of ELs, use of data to evaluate progress, and the creation of plans with long/short term goals. Furthermore, MD implements a data driven process in partnership with LEAs to implement strategic actions when goals are not met.</p> <p>MD identifies an ongoing monitoring process of EL program improvement that depends on both an independent locally developed process focused on the LEAs needs and a standardized statewide process carried out by an external EL expert. The first will occur at multiple strategic points each school year while the second will be in-depth once every three years.</p> <p>The Maryland Department of Education has two Education Program Specialists that monitor, on a three-year cycle, the 21 LEAs that receive Title III subgrants. Information provided on page 63 of the Consolidated Plan describes a process that includes on-site visits, classroom observations, desk</p>

	monitoring, monthly conference calls, the option of face-to-face meetings, and customized professional development.
<i>Strengths</i>	<p>MD has two program specialists to support monitoring of ELs programs and provide LEAs with technical assistance.</p> <p>The plan outlines a two-part monitoring process and support to improve EL services in LEAs. The first part of the monitoring process is a three-year cycle of external evaluation of the LEA and school level programs; this requires state EL program experts complete extensive review and provide feedback to seven different districts each year. The second part of the monitoring process occurs at the local level to include a program needs assessment/root cause analysis that will be used to develop and implement a plan to create a positive change in any potential root causes of low English language acquisition. The state program experts provide ongoing support to LEAs struggling to meet the state long-term goals.</p>
<i>Weaknesses</i>	
<i>Did the SEA meet all requirements?</i>	<input checked="" type="checkbox"/> Yes (4 peer reviewer(s)) <input type="checkbox"/> No (# peer reviewer(s))
<i>If no, describe the specific information or clarification that an SEA must provide to fully meet this requirement</i>	