Maryland Methods of Administration Plan

Ensuring Equitable Access to High-Quality Career and Technical Education for All Students

MARYLAND STATE DEPARTMENT OF EDUCATION
EQUITY AND EXCELLENCE

Division of Career and College Readiness

July 2020

Maryland State Board of Education
Brigadier General Warner I. Sumpter, USA Ret.
President

A full list of Maryland State Board of Education Members can be found on the Maryland State Department of Education's website.

Maryland State Department of Education
Karen B. Salmon, Ph.D.
State Superintendent of Schools

Carol A. Williamson, Ed.D.
Deputy State Superintendent of Teaching and Learning

Division of Career and College Readiness
Tiara Booker-Dwyer
Assistant State Superintendent

Nicassia Belton, Ed.D.
Director of Data and Accountability for Career Programs and
Methods of Administration Coordinator

Marquita Friday
Director of Career Programs

Nina Roa
Director of Finance and Legislation for Career Programs

A full Division staff list is in Appendix C.

Larry Hogan
Governor

The Maryland State Department of Education does not discriminate on the basis of age, ancestry/ national origin, color, disability, gender identity/expression, marital status, race, religion, sex, or sexual orientation in matters affecting employment or in providing access to programs and activities and provides equal access to the Boy Scouts and other designated youth groups. For Inquiries related to Department policy, please contact:

Equity Assurance & Compliance Office
Office of the Deputy State Superintendent for Finance and Administration

Maryland State Department of Education
200 West Baltimore Street, Baltimore, MD 21201-2595
410-767-0426 - Voice, 410-767-0431 – Fax, 410-333-6442 - TTY/TDD

Copyright © 2020 MSDE All Rights Reserved

TABLE OF CONTENTS

Introduction **3**

MOA Plan Development 3

Table 1: Opportunities to Provide Input on the Maryland MOA Plan 6

Approval of the Maryland MOA Plan 8

Plan for Performing Oversight Responsibilities **9**

Recipient Universe 9

Processes and Procedures to Conduct Compliance Reviews 12

Selection Plan *13*

Selection Criteria 13

Ranking Process 15

Compliance Review *17*

Timeline for MOA and Perkins Process and Procedures 25

Technical Assistance **27**

Appendix A: Approval of the Maryland Methods of Administration Plan **28**

Appendix B: Personnel Responsible for Facilitating MOA and Perkins Compliance Reviews **29**

Appendix C **30**

Introduction

The Methods of Administration (MOA) program aims to ensure that all students have equal access to high-quality career and technical education (CTE) programs. MOA is facilitated through the United States Department of Education Office of Civil Rights. The Maryland State Department of Education (MSDE) is the lead agency responsible for administration of MOA requirements across the state of Maryland. The Maryland MOA plan describes how the MSDE will implement federal MOA requirements to support equitable student access to CTE programs of study. The Maryland MOA plan is purposefully aligned to the Maryland CTE Four-Year State Plan, which was approved by the United States Department of Education in May 2020, to ensure a consistent approach to CTE statewide.

CTE programs of study are implemented in 24 local school systems, 15 community colleges, and 22 state-operated programs (e.g. Juvenile Services Education and Adult Correctional Facilitates). Each entity that implements a CTE program of study and receives federal funds (referred to as "recipients" throughout this document) is required to adhere to MOA and Perkins V requirements. The Division of Career and College Readiness at the MSDE is responsible for facilitating the compliance review process to ensure that all recipients adhere to federal requirements established by MOA and Perkins V. Traditionally, MOA and Perkins compliance reviews were completed in isolation of each other. Beginning in the 2020-2021 school year, MOA and Perkins compliance reviews will be consolidated to one comprehensive review process for CTE. Consolidated reviews support a holistic approach to monitor compliance with MOA and Perkins V requirements, review implementation, assess outputs, and measure effectiveness of CTE statewide. The Division of Career and College Readiness will use outcomes from compliance reviews to inform technical assistance, professional learning experiences, and resources provided by the state to recipients to support implementation of practices that support equity in CTE programs statewide.

MOA Plan Development

Educational equity is a priority for the MSDE. In October 2019, the Maryland State Board of Education established educational equity as a matter of policy and priority in Maryland public schools. Code of Maryland Regulation 13A.01.06 require the following:

- Each Maryland public school will provide every student equitable access to the educational rigor, resources, and support that are designed to maximize the student's academic success and social/emotional well-being;
- Each local school system's procedures and practices provide for educational equity and ensure that there are no obstacles to accessing educational opportunities for any student; and
- Achievement will improve for all Maryland students and achievement gaps will be eliminated.

Equity is also the cornerstone of the Maryland CTE Four-Year State Plan and Maryland State Plan for Postsecondary Education, which informed MOA plan development.

Over the course of the last year, the Division of Career and College Readiness collaborated with over 300 stakeholders to revise the vision and direction for CTE in Maryland to ensure that all students have equitable access to high-quality CTE programs of study. The revised vision (Figure 1) and direction for CTE is defined in the Maryland Career and Technical Education Four-Year State Plan. The Maryland MOA Plan aligns to the revised vision and direction for CTE.

Figure 1: Vision for CTE

The Maryland MOA Plan is

- ✓ grounded in the state's vision and mission for CTE and the Maryland CTE Four-Year State Plan;
- ✓ guided by requirements of the federal
  - Strengthening Career and Technical Education for the 21st Century Act (Perkins V),
  - Guidelines for the Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs (MOA Guidelines) (34 C.F.R. Part 100, Appendix B),
  - Title VI of the Civil Rights Act of 1964 (34 C.F.R. Part 100),
  - Title IX of the Education Amendments of 1972 (34 C.F.R. Part 106),
  - Section 504 of the Rehabilitation Act of 1973 (34 C.F.R. Part 104),
  - Title II of the Americans with Disabilities Act of 1990 (28 C.F.R. Part 35); and
- ✓ informed by the Maryland Workforce Innovation and Opportunity Act (WIOA) State Plan, Maryland State Plan for Postsecondary Education, and the Maryland Commission on Innovation and Excellence in Education.

Input from stakeholders informed the development of the Maryland MOA plan. Invitations to participate in MOA Stakeholder Virtual Meetings were sent to individuals representing industry, business, higher education, local school systems, professional organizations, state agencies, and special populations groups. Stakeholders groups met virtually on June 24, 2020 and June 25, 2020 to review and provide feedback on the draft Maryland MOA plan. The Division of Career and College Readiness led all meetings.

Meetings began with a general session that provided an overview of MOA requirements and the impact of MOA on CTE. After the general session, two breakout sessions were facilitated. One session provided the opportunity for participants to provide feedback on the selection criteria and ranking procedures used to identify recipients for MOA compliance reviews. The second session provided the opportunity for participants to provide feedback on MOA review criteria and process. After breakout sessions, meeting participants reconvened to review content discussed in breakout sessions, provide input on the technical assistance section of the MOA plan, and discuss next steps. All meeting were recorded and posted publically on the Methods of Administration webpage. Table 1 identifies meeting dates, participants, and outcomes.

Feedback from virtual meetings included:

- revise language in review criteria to reflect both secondary and postsecondary environments;
- include measures that account for smaller school systems in the analysis of data as smaller sampler sizes may provide less meaningful information on student group representation from year to year;
- incorporate corrective actions in Perkins Local Applications;
- expand technical assistance prior to identification and throughout the review process;
- communicate MOA requirements with executive leadership at school systems, community colleges, and state-operate programs;
- identify staff who would serve on a MOA review coordination group for a local school system or community college; and
- provide monitored systems with sample documents of typical findings, violations, and remedies.

Feedback provided was used to revise the MOA plan and supporting technical assistance documents.

The Maryland MOA Plan was posted publically on the Methods of Administration webpage on the MSDE website along with a link to provide feedback. The announcement to provide feedback was shared via social media and through emails to stakeholder groups. Only two comments were received online and both comments were in support of the MOA plan.

Overall, the majority of stakeholders agreed with the outlined MOA selection criteria, ranking process, review criteria, monitoring process, timetable, and MOA plan.

Table 1: Opportunities to Provide Input on the Maryland MOA Plan

Meeting or Public Comment Date	Participants	Outcomes
June 13, 2020 – June 24, 2020	14 Day Public Comment Period on Method of Administration Plan	The public had the opportunity to provide input in writing on the entire Methods of Administration plan.
June 24, 2020	**MOA Stakeholder Meeting** 45 participants representing the following organizations: 1. Allegany College 2. Charles County Public Schools 3. Frederick County Public Schools 4. Governor's Workforce Development Board 5. Howard County Public Schools 6. Juvenile Services Education Agency 7. Maryland Agriculture Education Foundation 8. Maryland Business Roundtable for Education 9. Maryland Commission on Civil Rights 10. Maryland Department of Disabilities 11. Maryland Department of Labor - Division of Workforce Development and Adult Learning/Correctional Education 12. Maryland Department of Rehabilitation Services 13. Maryland Higher Education Commission 14. Maryland State Department of Education of Education - Network for Equity and Excellence in Education 15. Maryland State Department of Education - Office of Equity Assurance and Compliance 16. Montgomery College 17. Queen Anne's County Public Schools	MOA Stakeholder Meeting participants reviewed and provided feedback on the selection criteria, ranking process, review criteria, monitoring process, procedures, and timetable sections of the plan.
June 25, 2020	**CTE Directors' Meeting** 32 participants representing the following organizations: 1. Allegany County Public Schools 2. Anne Arundel County Public Schools 3. Baltimore City Public Schools 4. Baltimore County Public Schools 5. Calvert County Public Schools 6. Caroline County Public Schools 7. Carroll County Public Schools 8. Cecil County Public Schools 9. Charles County Public Schools 10. Dorchester County Public Schools	CTE Directors' Meeting participants provided input on the selection criteria, ranking process, review criteria, monitoring process, timetable, and technical assistance sections of the MOA plan.

Meeting or Public Comment Date	Participants	Outcomes
	11. Frederick County Public Schools 12. Garrett County Public Schools 13. Harford County Public Schools 14. Howard County Public Schools 15. Maryland Agricultural Education Foundation 16. Maryland Department of Labor - Division of Workforce Development and Adult Learning/Correctional Education 17. Montgomery County Public Schools 18. Prince George's County Public Schools 19. Queen Anne's County Public Schools 20. St. Mary's County Public Schools 21. Talbot County Public Schools 22. University of Maryland Eastern Shore 23. Wicomico County Public Schools 24. Worcester County Public Schools	
June 25, 2020	**<u>Community College Meeting</u>** 20 participants representing the following organizations: 1. Allegany College of Maryland 2. Anne Arundel Community College 3. Baltimore City Community College 4. Chesapeake College 5. College of Southern Maryland 6. Community College of Baltimore County 7. Frederick Community College 8. Garrett Community College 9. Hagerstown Community College 10. Harford Community College 11. Howard Community College 12. Maryland Agricultural Education Foundation 13. Montgomery Community College 14. Prince George's Community College 15. Wor-Wic Community College	Community college meeting participants provided input on the selection criteria, ranking process, review criteria, monitoring process, timetable, and technical assistance sections of the MOA plan.

Approval of the Maryland MOA Plan

The MSDE is the sole agency responsible for approval of the Maryland MOA Plan. The final plan was presented to the Assistant State Superintendent of the Division of Career and College Readiness, the Deputy Superintendent of Teaching of Learning, and the State Superintendent of Schools for approval. Refer to Appendix A for approval signatures.

After final approval was received, the Maryland MOA Plan was submitted to the United States Department of Education, Office of Career Technical and Adult Education by the July 2020 deadline.

Plan for Performing Oversight Responsibilities

The Maryland MOA Plan for Performing Oversight Responsibilities identifies Maryland's compliance plan to prevent, identify, and remedy discrimination based on race, color, national origin, sex, and disability in CTE programs of study. It also outlines the plan to analyze civil rights data and information; analyze Perkins V data and requirements; conduct periodic compliance reviews both in-person and virtually; notify recipients of illegal discrimination to remedy; and address corrective actions.

Recipient Universe

Recipients are each entity that implements a CTE program of study and receives federal funds. All recipients are required to adhere to MOA and Perkins V requirements. Maryland recipients include 24 local school systems, 15 community colleges, and 22 state-operated programs. The five largest school systems in the state, those enrolling 75,000 or more students, are subdivided into regions. MOA compliance reviews occurs at the school level. Regionalizing larger school systems ensures that the state can facilitate a review process that accurately reflects equitable practices across the entire school system. The school systems that are subdivided include:

- Anne Arundel County - 2 regions,
- Baltimore City - 4 regions,
- Baltimore County - 5 regions,
- Montgomery County - 6 regions, and
- Prince George's County - 5 regions.

Community colleges with multiple campuses are represented as single sites for the purpose of compliance reviews. As a result, Maryland includes a total of 78 recipients including:

- 41 Local school system regions,
- 15 Community colleges, and
- 22 State-operated programs.

Local School Systems: There are 24 local school systems in Maryland. Large school systems are subdivided into smaller regions. Table 2 list local school systems and the year(s) they have participated in on-site MOA and Perkins reviews.

Table 2: List of the local school system recipients and onsite compliance review years

	Local School Systems	MOA Review Years	Perkins Review Years
1	Allegany County	1991	2017
2	Anne Arundel County, North	1991, 2000, 2009	2018
3	Anne Arundel County, South	1991, 2000	
4	Baltimore City, North East	1991, 2019	2015
5	Baltimore City, North West	1991, 2015	
6	Baltimore City, South East	1991	
7	Baltimore City, South West	1991	
8	Baltimore County, Central	1995	2016
9	Baltimore County, North East	1995	
10	Baltimore County, North West	1995	
11	Baltimore County, South East	1995, 2004	
12	Baltimore County, South West	1995	
13	Calvert County	1995, 2012	2018
14	Caroline County	1996. 2015	2014
15	Carroll County	1992, 2011	2018
16	Cecil County	1993	2019
17	Charles County	1990, 1999, 2018	2017
18	Dorchester County	1991, 2008	2014
19	Frederick County	1990, 2008	2016
20	Garrett County	1993	2015
21	Harford County	1992, 2004	2019
22	Howard County	1995, 2016	2017
23	Kent County	1998, 2005	2014
24	Montgomery County, Cluster 1	1993, 2006	2015
25	Montgomery County, Cluster 2	1993	
26	Montgomery County, Cluster 3	1993, 2011	
27	Montgomery County, Cluster 4	1993	
28	Montgomery County, Cluster 5	1993	
29	Montgomery County, Cluster 6	1993	
30	Prince George's County, Region I	1992	2015
31	Prince George's County, Region II	1992, 2014	
32	Prince George's County, Region III	1992	
33	Prince George's County, Region IV	1992	
34	Prince George's County, Region V	1992, 2016	
35	Queen Anne's County	1993, 2018	2016
36	St. Mary's County	1996	2017
37	Somerset County	1990, 2009	2015
38	Talbot County	1990, 2017	2015

	Local School Systems	MOA Review Years	Perkins Review Years
39	Washington County	1989, 2009	2018
40	Wicomico County	1993, 2013	2017
41	Worcester County	1997, 2013	2017

Community Colleges: There are 15 community colleges that participant in MOA compliance reviews. Colleges with multiple campuses provide a single set of data to the Division of Career and College Readiness. As a result, they are not subdivided for compliance review. Table 3 list community colleges and the year(s) they have participated in MOA and Perkins reviews.

Table 3: List of community college recipients and on-site compliance review years.

	Community Colleges	MOA Review Years	Perkins Review Years
1	Allegany College	1990, 2003, 2019	2017
2	Anne Arundel Community College	1997, 2008	2018
3	Baltimore City Community College – Harbor, Liberty Heights	1982, 2006	2015
4	Cecil Community College	1993	2019
5	College of Southern Maryland (formerly named Charles County Community College)	1985, 2000	2017
6	Chesapeake College – Cambridge Center, Wye Mills	1999	2015
7	Community Colleges of Baltimore County – Catonsville, Dundalk, Essex	1995, 2005	2016
8	Frederick Community College	1992, 2015	2016
9	Garrett Community College	1988, 2010	2015
10	Hagerstown Community College	1998	2018
11	Harford Community College	1996, 2017	2019
12	Howard Community College	1991, 2004	2017
13	Montgomery College – Germantown, Rockville, Takoma Park	1991, 2008	2015
14	Prince George's Community College	1986, 2016	2015
15	Wor-Wic Community College	1987, 2012	2015

State-Operated Programs: There are 22 state-operated programs that provide approved occupational programs. State-operated programs are offered in adult correctional facilities and juvenile residential facilities. Traditionally, state-operated programs did not participate in the Perkins review process. Moving forward, all state-operated programs will be required to participate in compliance reviews for MOA and Perkins. All state-operated programs are open-entry/open-exit with participation based on those meeting institutional criteria. Table 4 list state-operated programs and the year they participated in an MOA review.

Table 4: List of state-operated programs recipients and on-site MOA compliance review year.

	State-Operated Programs	MOA Review Year
	Adult Facilities	
1	Eastern Correctional Institution- East	No record of compliance review
2	Eastern Correctional Institution – West	No record of compliance review
3	Maryland Correctional Institution-Jessup	No record of compliance review
4	Maryland Correctional Institution – Hagerstown	No record of compliance review
5	Maryland Correctional Institution - Women	2002
6	Maryland Correctional Training Center	2002
7	Occupational Skills Training Center	2002
8	Patuxent Institution	No record of compliance review
9	Roxbury Correctional Institution	2002
10	Western Correctional Institution	No record of compliance review
	Juvenile Facilities	
11	Baltimore City Juvenile Justice Center	No record of compliance review
12	Garrett Children's Center	No record of compliance review
13	Cheltenham Youth Detention Center	No record of compliance review
14	Green Ridge Youth Center	No record of compliance review
15	Charles H. Hickey Detention Center	No record of compliance review
16	Lower Eastern Shore Children's Center	No record of compliance review
17	Mountainview	No record of compliance review
18	Alfred D. Noyes Center	No record of compliance review
19	Savage Mountain Youth Center	No record of compliance review
20	Victor Cullen Center	No record of compliance review
21	Thomas J.S. Waxter Children's Center	No record of compliance review
22	Western Maryland Children's Center	No record of compliance review

Processes and Procedures to Conduct Compliance Reviews

Compliance reviews will be facilitated on-site or virtually by a team led by the Division of Career and College Readiness. Appendix B identifies team leads for compliance reviews. The team aims to conduct a total of ten compliance reviews per year. The bulleted list identifies the projected number of reviews that will occur per year for secondary, postsecondary, and state-operated institutions, which include a minimum of two secondary reviews and one postsecondary review.

- Secondary – 5 reviews
- Postsecondary – 3 reviews
- State-Operated Programs – 2 reviews

Reviews will either be on-site or virtual. Both type of compliance reviews will require interviews and submission of evidence by the recipient to the Division of Career and College Readiness demonstrating that all criteria have been met.

Selection Plan

The Selection Plan, referred to as the Targeting Plan in the Federal Memorandum of Procedures, outlines how recipients will be identified for compliance reviews and the type of review (on-site or virtual) that will be facilitated. The Selection Plan has been developed to:

1. include criteria that focus on maintaining equal access to all CTE programs of study regardless of gender, race, and special population student groups;
2. support and encourage advancement in achieving equitable education opportunities and attainment of performance targets for students in protected classes; and
3. focus on the quality and effectiveness of CTE programs of study.

Selection Criteria

Recipients will be selected for compliance review based on established criteria and benchmarks used to

- measure the level of CTE access by demographics,
- identify performance inequities among various student groups in meeting Perkins performance targets, and
- direct attention to recipients who may require support in maintaining and growing the quality and effectiveness of their programs of study.

Disparity percentage benchmarks were developed in alignment with Maryland's CTE Local Needs Assessment evaluation benchmarks and analysis of student group population distributions.

Local School Systems and Community Colleges: Maryland's Selection Plan includes twelve criteria used in ranking and selecting local school systems and community colleges. Points are awarded for access, equity, and quality. Cluster datasets less than ten are excluded from analysis to ensure meaningful and reliable analysis of student group disproportionality from year to year. Table 5 identifies how points are awarded for each criterion.

Table 5: Selection criteria for local school system and community colleges

ACCESS	I	**CTE Disproportionate Gender Enrollment**	
		Enrollment percentage of students based on gender compared to recipient's total enrollment percentage (+/-20% or greater).	**+2 points** assigned to each CTE cluster that is disproportionate by gender.
	II	**CTE Disproportionate Disability Enrollment**	
		Enrollment percentage of students with disabilities in CTE programs compared to the recipient's total enrollment percentage of students with disabilities (+/-5% or greater).	**+2 points** assigned to each CTE cluster having a disproportionate enrollment of students with disabilities.
	III	**CTE Disproportionate Minority Enrollment**	
		Enrollment percentage of students with minority status* in CTE programs compared to recipient's total enrollment percentage of students with minority status (+/-10% or greater).	**+2 points** assigned to each CTE cluster having a disproportionate minority student enrollment.
	IV	**CTE Disproportionate Economically Disadvantaged Enrollment**	
		Enrollment percentage of economically disadvantaged students compared to recipient's total enrollment percentage of economically disadvantaged students (+/-10% or greater).	**+2 points** assigned to each CTE cluster having a disproportionate enrollment of students from economically disadvantaged backgrounds.
	V	**CTE Disproportionate English Learner Enrollment**	
		Enrollment percentage of English Learner students compared to recipient's total enrollment percentage of English Learner students (+/-5% or greater).	**+2 points** assigned to each CTE cluster having a disproportionate English Learner student enrollment.
EQUITY	VI	**CTE Disproportionate Performance for Gender**	
		For each CTE cluster, the gender student group not meeting target for each performance indicator once target was met in the cluster.	**+1 point** assigned for each CTE cluster where a gender student group did not meet performance target for each performance indicator. (Non-traditional concentrator enrollment indicator excluded)
	VII	**CTE Disproportionate Performance for Race**	
		For each CTE cluster, the racial student group not meeting target for each performance indicator once target was met in the cluster.	**+1 point** assigned for each CTE cluster where a racial student group did not meet performance target for each performance indicator.
	VIII	**CTE Disproportionate Performance for Economically Disadvantaged**	
		For each CTE cluster, the economically disadvantaged student group not meeting performance target for each performance indicator once target was met in the cluster.	**+1 point** assigned for each CTE cluster where the economically disadvantaged student group did not meet performance target for each performance indicator.

EQUITY	IX	**CTE Disproportionate Performance for Students with Disabilities**	
		For each CTE cluster, students with disabilities not meeting target for each performance indicator once target was met in the cluster.	**+1 point** assigned for each CTE cluster where students with disabilities did not meet performance target for each performance indicator.
	X	**CTE Disproportionate Performance for English Learner Students**	
		For each CTE cluster, English Learner students not meeting target for each performance indicator once target was met in the cluster.	**+1 point** assigned for each CTE cluster where English Learner students did not meet performance target for each performance indicator.
QUALITY	XI	**CTE Program Performance**	
		For each CTE program of study, students not meeting performance target within 90%.	**+1 point** assigned for each CTE program of study for every year target is not met in a three-year span for each performance indicator.
	XII	**Time Since Last Review**	
		The number of years since the recipient's last on-site MOA review.	+**1 Index Point** assigned for each year. Recipient history is calculated directly into the Index Score

*Minority status percentage metric is defined as the combined percentages of African-American, Pacific Islander, Native American/Alaskan and Hispanic students enrolled in a sub-region.

State Operated Programs: For state operated programs, two adult facilities or juvenile facilities or a combination of the two will be selected for review each year. First priority will be given to facilities with an unknown date of last review and second priority will be given to facilities with a date of last review that occurred ten years ago or more.

Ranking Process

Specific selection data will be compiled utilizing the selection criteria as described previously and by the ranking system as described below.

Local School Systems: All local school systems will be listed based on final point assignment in order of points awarded from lowest to highest. The five local school systems with the most points will participate in compliance review each year. The local school system with the most points in a given year will participate in an on-site review the remaining four school systems will participate in virtual reviews. School systems also have the option to submit a written request for an on-site compliance review.

Exclusions: Recipients will be excluded from further monitoring reviews for the period of two years to allow for any corrective actions or actions plans to be implemented.

Tie-breakers: In the event the rankings lead to a tie, the deciding factor will be the date of last review. This would mean that the recipient with the longest time since last review will be selected over the recipient with the more recent review date.

Exceptions:
(1) In a case where more than two regions of a single local school system are listed with the most points, only one of the regions in that local school system will be chosen and the next highest ranking recipient from a differing local school system will be chosen.
(2) In the event a recipient cannot be visited due to some unforeseen circumstance, then the next ranked recipient will be selected.

Community College: All community colleges will be listed based on final point assignment in the order of rank from lowest to highest. The three community colleges with the most points will participate in compliance review during the reporting cycle. The community college with the most points will participate in an on-site review and the remaining colleges will participate in a virtual review. Community colleges also have the option to submit a written request for an on-site compliance review.

Exclusions: Recipients will be excluded from further monitoring reviews for the period of two years to allow for any corrective actions/actions plans to be implemented.

Exceptions:
(1) In a case where the community college selected maintains more than one campus site listed as a recipient, the recipient (campus site) with the longest time since last review will be selected over the recipient (campus site) with the more recent review date.
(2) In the event a recipient cannot be visited due to some unforeseen circumstance, the next ranking recipient will be selected.

State Operated Programs: State operated programs will not be ranked. Instead, two adult facilities or juvenile facilities will be selected for on-site reviews during the two-year reporting cycle. Priority will be given to facilities with an unknown date of last review and second priority will be given to facilities with a date of last review that occurred ten years ago or more.

Exclusions: Recipients will be excluded from further monitoring reviews for the period of two years to allow for any corrective actions/actions plans to be implemented.

Compliance Review

Recipients identified through the selection plan must demonstrate compliance with MOA criteria. Evidence for all criteria will be collected prior to facilitation of virtual or on-site reviews.

Each year, the Division of Career and College Readiness will release the list of recipients identified through the selection plan for on-site and virtual reviews. Compliance review notifications will be sent to the Superintendent, College President, or State-Operated Program Executive Administrator at least ninety days prior to review date. Recipients will be required to submit MOA Review documentation to the Division of Career and College, for a desk audit at least thirty days prior to their review date for either the virtual or the on-site review.

Recipients will be required to compile, at minimum, specific documented items and submit electronically to the Division of Career and College Readiness. The twelve MOA-specific monitoring review criteria and the aligned requested evidence are outlined in the tables on the following pages.

Administrative Criteria
Compliance Review Criteria #1

Recipient has:

- taken continuing steps to notify students, applicants, parents, employees, and unions or professional organizations that its policies do not discriminate based on race, color, national origin, sex or disability.
- provided an annual public notice of nondiscrimination prior to the beginning of each school year that advises students, parents, employees, and the general public that all CTE program opportunities will be offered to all students regardless of race, color, national origin, sex or disability or age.
- designated at least one qualified employee to coordinate efforts to comply with Section 504, Title II, Title VI, and Title IX. The recipient must notify students, staff, and the public of the name and/or title, address and phone number of designated employee(s).
- adopted and published grievance procedure for prompt and equitable resolution of complaints alleging discrimination based on sex, race, color, national origin, or disability.

Requested Evidence

- A copy of the recipient's continuous nondiscrimination notice.
- Copies of a variety of the recipient's publications that notify applicants, students, employees, and parents that it does not discriminate on the basis of race, color, national origin, sex, or disability. Can include the following:

  - o Brochures on programs, activities
  - o Student application
  - o Job application
  - o Catalog
  - o Student handbook
  - o Staff handbook
  - o Job announcements
  - o Posters advertising various programs
  - o Recruitment materials
  - o Website
  - o School newspaper

- Copies of the annual public notice of nondiscrimination as published in local newspapers, recipient's newsletters, radio/TV, etc.
- Description of plans for providing annual public notice to visually impaired and national origin minority persons.
- Document(s) which designate the Title IX and Section 504 Coordinator(s) that includes name (or position), business address, and phone number.
- Copies of the recipient's publications that notify applicants, students, employees, and parents of the names or titles, addresses, and phone numbers of the Title IX and Section 504 Coordinator(s) in the notice of nondiscrimination
- The job description for the Title IX and Section 504 Coordinator(s) which outlines the duties and responsibilities of the position(s).
- Description of the training the Title IX and Section 504 Coordinator(s) have received.
- A copy of the recipient's grievance procedure for persons who feel like they have been discriminated against based on sex or disability.
- Copies of publications/list of locations where the recipient's grievance procedure can be accessed by students, employees, parents, and patrons.

Recruitment Criteria Compliance Review Criteria #2
Recipient has established and implemented a process to ensure that: • recruitment activities do not exclude or limit opportunities based on sex, race, color, national origin, or disability. • recruitment materials do not contain biased or stereotypical contents. • recruitment teams represent diverse populations. • counselors can communicate with limited English proficiency populations and persons with sensory impairments. • recruitment materials are available to communities of minority-language speakers in their native languages.
Requested Evidence
• Copy of CTE recruitment plans. • Description of CTE recruitment activities. • Copies of CTE recruitment materials, including brochures, flyers, newspaper ads, course catalogs, etc. • Copy of CTE course catalog / course descriptions. • Written plan for recruiting individuals with English as a second language. • Written plan for recruiting individuals with hearing impairments. • Samples of recruiting materials in alternative languages/formats (as applicable).

Admissions Criteria Compliance Review Criteria #3
Recipient has established and implemented a process to ensure that: • student admission eligibility criteria does not discriminate on the basis of race, color, national origin, sex, disability, or English proficiency. • candidates for admission to CTE programs of study are not assessed based on race, color, national origin, sex, or disability. • there are no preadmission inquiries about marital, parental, pregnancy, or disability status. • access is not denied to any CTE program of study to students with a disability. • policies and procedures are in place for identifying and serving limited English proficient students and students with disabilities.
Requested Evidence
• Admissions policy for CTE and description of admissions process. • Procedures and criteria for selective admissions to CTE programs where there are more applicants than can be accommodated. • Demographics of rejected candidates by selection criteria. • Procedure for Limited English Proficiency/English Learner identification and placement.

Counseling Criteria Compliance Review Criteria #4
Recipient has established and implemented a process to ensure that: • counseling materials do not discriminate against individuals based on race, color, national origin, sex, or disability. • counselors do not direct students into programs nor measure their prospect for success based on race, color, national origin, sex, or disability. • counselors do not direct students with disabilities toward more restrictive career objectives. • disproportionate enrollments do not result from unlawful discrimination.
Requested Evidence
• Copy of the recipient's written guidance plan. • Copy of the recipient's assessment plan. • Calendar of counseling and pre-CTE activities. • Copy of enrollment forms. • Description of the process to identify and address disproportionate enrollment in CTE programs.

Site Location and Student Eligibility Criteria Compliance Review Criteria #5
Recipient has established and implemented a process to ensure that: • CTE facilities, renovations, and building sites are accessible and do not result in disproportionately excluding students of certain race, color, national origin, sex, or disability. • geographic boundaries do not unlawfully exclude students on the basis of race, color, national origin, sex, or disability.
Requested Evidence
• Copy of policies for student admission criteria. • Copy of student enrollment demographics by program. • Population demographics of recipient's attendance area or local community.

Services for Students with Disabilities Criteria Compliance Review Criteria #6
Recipient has established and implemented a process to ensure that: • related aids or adaptations are available as necessary. • educational settings accommodate the needs of all learners. • students with disabilities are placed according to the provisions of Section 504. • tests of academic achievement measure abilities and achievement.
Requested Evidence
• Description of how the recipient provides access to all programs, courses, services, and activities offered to students with disabilities. • Description of how equipment and/or facilities have been adapted to accommodate students with disabilities. • Policy(ies) for providing aids and services to students. • Provide aids and services available to students with disabilities. • Provide a copy of policies governing use of service animals, tape recorders, note takers, etc. • Provide a copy of recipient's Free and Public Education (FAPE) policy and procedures. • Description of how staff familiar with CTE programs participate in FAPE and/or Section 504 placement decisions for students with disabilities. • Policies for testing modification for students with disabilities. • Provide a list of testing modifications that have been used by the recipient for persons with disabilities.

Accessibility of Facilities Criteria Compliance Review Criteria #7
Recipient has established and implemented a process to ensure that: • each facility or part of a facility, constructed under standards for construction initiated on or after January 27, 1992 (ADA or UFAS) by, on behalf of, or for the use of a recipient, is readily accessible and usable by persons with disabilities. • each facility or part of a facility constructed under standards for construction initiated or altered on or after January 18, 1991 (UFAS) by, on behalf of, or for the use of a recipient, is readily accessible and usable by persons with disabilities. • existing facilities whose construction or alteration initiated before June 4, 1977 (ANSI) when viewed in entirety, are readily accessible to disabled persons, programs or activities, or when each part is viewed in its entirety, are readily accessible to disabled persons. • each facility or part of a facility, constructed under standards for construction initiated or altered between June 4, 1977 and January 18, 1991 (ANSI) by, on behalf of, or for the use of a recipient, is readily accessible and usable by persons with disabilities.
Requested Evidence
• Copy of the Americans with Disability Act (ADA) accessibility self-study. • Copy of the ADA transition plan. • Listing or description of facility modifications with dates made to assure accessibility compliance. • Copy of a notice of facility accessibility for activities/patron request for special requirements.

Comparable Facilities Criteria Compliance Review Criteria #8
Recipient has established and implemented a process to ensure that: • separate programs or facilities for students with disabilities are comparable to those of students without disabilities. • changing rooms, showers, and other facilities and equipment for students of one sex or students with disabilities are comparable to those of the other sex and to students without disabilities.
Requested Evidence
• Listing of separate programs, services, and/or facilities for students with disabilities. • Listing of separate programs, services, and/or facilities for male and female students. • Listing of separate programs, services, and/or facilities for English Learner students. • Description of action taken to ensure no disparities exist in programs, services, and/or facilities for students with disabilities, male/female students, or English Learner students.

Financial Assistance Criteria Compliance Review Criteria #9
Recipient has established and implemented a process to ensure that: • financial assistance in the form of loans, grants, scholarships, special funds, subsidies, compensation for work or prizes to CTE students is not provided on the basis of race, color, national origin, sex or disability, except to overcome the effects of past discrimination. • sex restricted financial assistance is administered only where the assistance and restriction are established by will, trust, bequest, or any other restricted legal instrument and the overall effect of all financial assistance awarded does not discriminate on the basis of sex. • materials and information used to notify students of opportunities for financial assistance do not contain language or examples that would lead applicants to believe the assistance is provided on a discriminatory basis. If the recipient's service area contains a community of national origin minority persons with limited English language skills, such information must be disseminated to that community in their language.
Requested Documentation
• Copy of policies or description of process for making all students aware of financial assistance opportunities.

Housing in Postsecondary Institutions (Postsecondary ONLY) Compliance Review Criteria #10
• Community College has ensured that housing opportunities have been extended without discrimination based on race, color, national origin, sex, or disability. • Community College provides at the same cost and under the same conditions, comparable, convenient and accessible housing to students with disabilities as on-campus or off-campus housing provided to student population.
Requested Evidence
• Copy of policies or description of process for making all students aware of housing opportunities. • Copy of housing application.

Work-Based Learning Criteria Compliance Review Criteria #11
Recipient has established and implemented a process to ensure that: • opportunities in work-based learning programs are made available to all students, regardless of race, color, national origin, sex, or disability. • prospective employers do not discriminate based on race, color, national origin, sex, or disability. • agreements for any work-based learning/training opportunities with any entity does not discriminate based on race, color, national origin, sex, disability. • written agreements include assurances of non-discrimination.
Requested Evidence
• Copy of apprenticeship, workplace, job-shadowing, and/or cooperative education agreements.

Employment of Faculty & Staff Criteria Compliance Review Criteria #12
Recipient has established and implemented a process to ensure that: • employment practices do not result in segregation, exclusion, or other discrimination against faculty and/or staff. • there are no pre-employment inquiries concerning disability, martial, or parental status. • all staff are notified of non-discrimination policies. • salary schedules reflect conditions and responsibilities of employment. • all positions are open to qualified candidates with reasonable accommodations provided. • demographics of the recipient's employees reflect the demographics of the community.
Requested Evidence
• Copy of employee handbooks. • Example job announcement. • Employee recruitment policies. • Copy of employment applications. • Salary schedule. • Promotion or tenure policy.

The review team led by the Division of Career and College Readiness will carefully review all of the evidence compiled to determine if there are any areas in which the recipient was non-compliant with federal civil rights laws and/or regulations. A Letter of Findings will be issued to the Superintendent, Chief Executive Office, College President, or State-Operated Program Executive Administrator within thirty days of the completion of the virtual or on-site visit. The Letter of Findings will describe in detail any areas of non-compliance that were found, specify the necessary corrective actions to be taken by the recipient, or confirm that all areas reviewed were compliant.

If areas of non-compliance are found, the recipient will have sixty days from the date of the Letter of Findings to submit to the Division of Career and College Readiness a MOA and Perkins Compliance Plan using an MSDE template. The MOA and Perkins Compliance Plan will be required to address each finding of non-compliance with a corrective action plan, which includes a specific date by which each finding will be fully addressed and resolved.

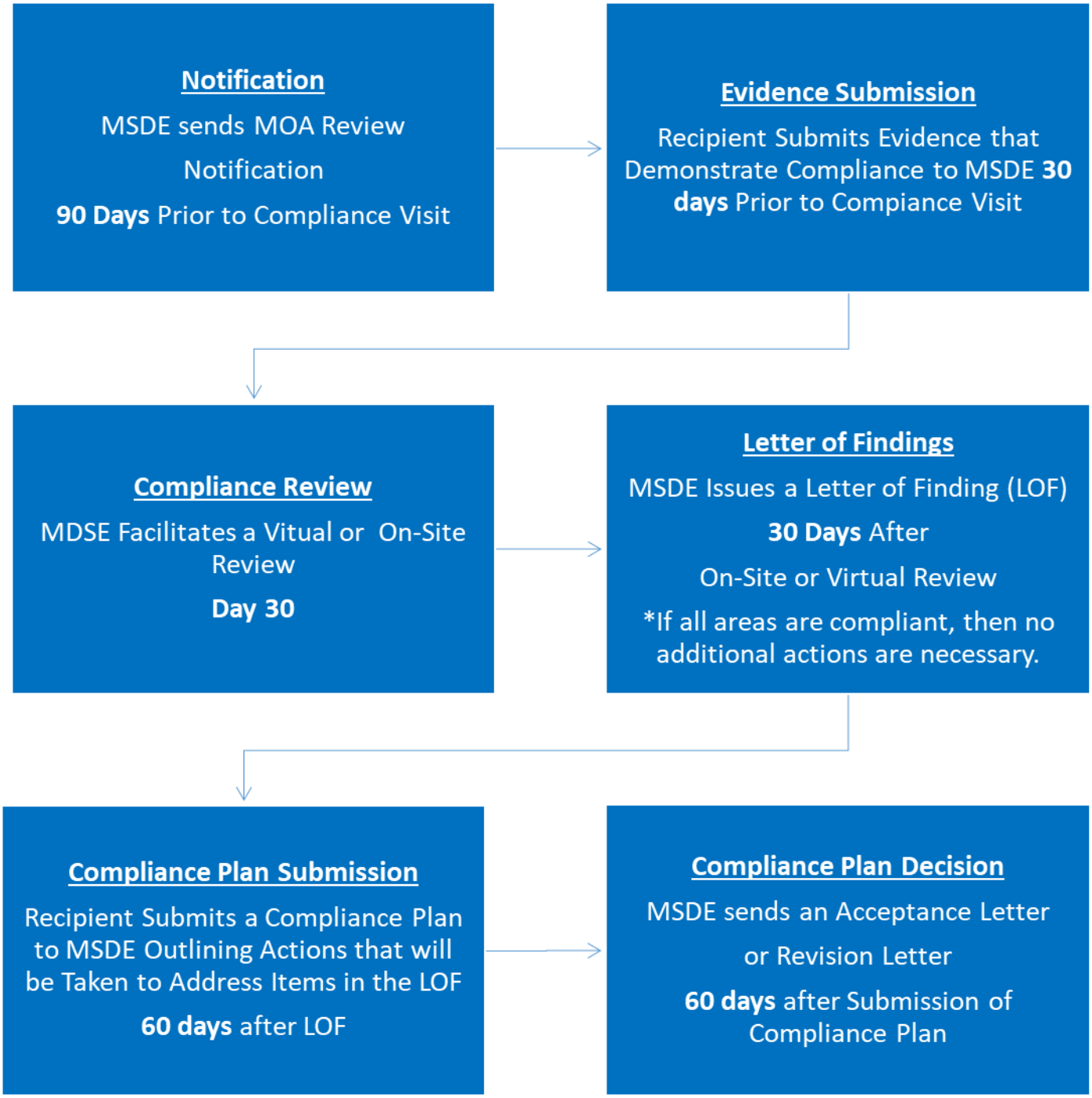
The review team will analyze materials submitted by the recipient. If submitted materials appropriately address the findings in the Letter of Findings then an Acceptance Letter will be issued by the Division of Career and College Readiness to the Superintendent, Chief Executive Office, College President, or State-Operated Program Executive Administrator. If the submitted material is found to be incomplete or insufficient then a follow-up letter will be sent by the Division of Career and College Readiness specifying the revisions that need to be made.

Once all of the necessary corrective actions have been fully addressed and completed, the recipient will be required to submit verifiable evidence for each finding to the Division of Career and College Readiness. This may include copies of completed work orders, revised documents, photos, etc. If the documentation is determined to be sufficient, a letter of Final Acceptance and Closure will be issued to the Superintendent, Chief Executive Office, College President, or State-Operated Program Executive Administrator. The Division of Career and College Readiness will follow up with quarterly updates with all reviewed recipients until MOA Compliance plans have been completed.

Timeline for MOA and Perkins Process and Procedures

Figure 2 provides a summary of the timeline for implementation of processes and procedures for MOA and Perkins compliance reviews.

Figure 2: Timetable



Technical Assistance

The Division of Career and College Readiness is committed to supporting recipients in achieving equitable outcomes for their students. Technical assistance is provided to help recipients prevent, identify, and remedy unlawful discrimination and meet federal requirements established by MOA and Perkins.

Statewide technical assistance is provided to all recipients. MOA and Perkins data is used to inform content for statewide technical assistance. Statewide technical assistance is facilitated through webinars, in-person convenings, resource development, and professional learning experiences. Quarterly meetings are held with CTE Directors of local school systems, Perkins Points of contact from community colleges, and representatives of state-operated programs. Technical assistance for MOA and Perkins are provided at quarterly meetings. There is a CTE Blackboard site for recipients where technical assistance resources (memos, presentations, bulletins, etc.) are posted. Recipients are notified when new resources are posted and when statewide meetings will be facilitated. The Division of Career and College Readiness works as a team to develop resources and facilitate statewide convenings. The list of the Division of Career and College Readiness team can be found in Appendix C.

The Division of Career and College Readiness also provides case-specific technical assistance to individual recipients before or after a compliance review. Recipients can contact the Equity and Civil Rights Compliance Specialist or their assigned Career Programs and Grant Specialist with specific technical assistance request. Refer to Appendix B for the list of specialists and their assigned regions.

Recently, the Consolidated Perkins and MOA Monitoring Program website was launched. The website builds awareness of MOA and Perkins, describes MOA policies and procedures, and shares essential information about MOA and Perkins. Examples of items on the website include:

- ✓ MOA and Perkins Monitoring and Selection Plan
- ✓ MOA and Perkins Evaluation Criteria List
- ✓ MOA and Perkins Document Checklist and Review Form
- ✓ Frequently Asked Questions
- ✓ Monitoring Review Process Webinars, Presentations, and Trainings
- ✓ Staff Contact Information

A comprehensive MOA Technical Assistance Manual is also available to recipients to support implementation of requirements identified in MOA.

The Division of Career and College Readiness will continue to work with stakeholders in the development and implementation of resources that support recipients in meeting MOA requirements to ensure that all students have equitable access to high-quality CTE programs of study.

Appendix A: Approval of the Maryland Methods of Administration Plan

The Maryland Methods of Administration Plan has been reviewed and approved by:

7/1/2020

Karen B. Salmon, Ph.D. Date
State Superintendent of Schools

6/26/2020

Carol A. Williamson, Ed.D. Date
Deputy Superintendent of Teaching and Learning

6/26/2020

Tiara Booker-Dwyer Date
Assistant State Superintendent for the
Division of Career and College Readiness and
Office of Leadership Development and School Improvement

Appendix B: Personnel Responsible for Facilitating MOA and Perkins Compliance Reviews

All MOA and Perkins compliance reviews will be led by the Division of Career and College Readiness and include a team of internal and external stakeholders.

Compliance Review Lead Personnel:

- Nicassia Belton, Ed.D – Director of Data and Accountability and MOA Coordinator
- Nina Roa – Director of Finance and Legislation for Career Programs
- China Wilson, Ph.D. – Equity and Civil Rights Compliance Specialist

The review of state-operated programs will be led by Dr. China Wilson. Table 6 identifies personnel that will provide technical assistance and facilitate compliance reviews in school system and community college.

Table 6: MOA and Perkins Compliance Review by School System and Community College.

Dean Kendall ***Career Programs and Grants Specialist - Region I***	
Baltimore City Community College	Cecil County Public Schools
Baltimore City Public Schools	Community College of Baltimore County
Baltimore County Public Schools	Harford Community College
Carroll Community College	Harford County Public Schools
Carroll County Public Schools	Howard Community College
Cecil College	Howard County Public Schools
Nancy Hauswald ***Career Programs and Grants Specialist - Region II***	
Allegany County Public Schools	Hagerstown Community College
Allegany College of Maryland	Kent County Public Schools
Anne Arundel Community College	Queen Anne's County Public Schools
Anne Arundel County Public Schools	Somerset County Public Schools
Caroline County Public Schools	Talbot County Public Schools
Chesapeake College	Washington County Public Schools
Dorchester County Public Schools	Wicomico County Public Schools
Garrett College	Worcester County Public Schools
Garrett County Public Schools	Wor-Wic Community College
Traci Verzi ***Interim Coordinator of Finance and Legislation for Career Programs*** ***Career Programs and Grants Specialist - Region III***	
Calvert County Public Schools	Montgomery College
Charles County Public Schools	Montgomery County Public Schools
College of Southern Maryland	Prince George's Community College
Frederick Community College	Prince George's County Public Schools
Frederick County Public Schools	St. Mary's County Public Schools

Appendix C: Division of Career and College Readiness and Office of Leadership Development and School Improvement Team Members

All members of the Division of Career and College Readiness Team, which includes the Office of Leadership Development and School Improvement, will support compliance reviews and technical assistance to recipients.

Tiara Booker-Dwyer, Assistant State Superintendent
Miranda Hill, Administrator to the Assistant State Superintendent

Nicassia Belton, Ed.D., Director of Data and Accountability for Career Programs and MOA Coordinator
China Wilson, Ph.D., Equity and Civil Rights Compliance Specialist
Osh Oshitoye, Ph.D., Coordinator of Data and Accountability for Career Programs

Marquita Friday, Director of Career Programs
Charles (Scott) Nichols, Interim Coordinator Career Programs, STEM, and Computer Science
Charles (Chuck) Wallace, Coordinator of Career Programs and Student Organizations
Michelle Brownson, Management Associate
Jennifer Griffin, Career Programs and Apprenticeship Specialist
Elissa Hozore, Computer Science Specialist
Kent Seuferer, Career Programs and Student Organization

Nina Roa, Director of Finance and Legislation for Career Programs
Traci Verzi, Interim Coordinator of Finance and Legislation for Career Programs
Hazel Hamond-Terry, Administrative Officer III
Nancy Hauswald, Career Programs and Grants Specialist, Region II
Dean Kendall, Career Programs and Grants Specialist, Region I

Office of Leadership Development and School Improvement
Ed Mitzel, Executive Director of Leadership Development and School Improvement
Laura Liccione, Coordinator of Academic Improvement
Morrall Thompson, Coordinator of Systematic Improvement
Anders Alicea, Instructional Transformation Specialist
Tara Corona, Continuous Improvement Specialist
Lori Ellis, Ed.D, Leadership Development Specialist
Katherine Key, Data Analyst
Felicia Lanham Tarason, Ed.D., School Leadership Support Specialist
Mary Minter, Ed.D., School Leadership Support Specialist