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Nancy S. Grasmick State Superintendent of Schools

200 West Baltimore Street • Baltimore, MD 21201 • 410-767-0100 • 410-333-6442 TTY/TDD

June 14, 2005

Mr. Raymond Simon, Deputy Secretary United States Department of Education 400 Maryland Avenue, S.W. Washington DC 20202-6100

Dear Mr. Simon:

Thank you for your recent approval of our requested changes to Maryland's accountability plan. We are proceeding with notifications to schools of their Adequate Yearly Progress based on that approval and are grateful to the Department for your rapid response to our request.

We are appreciative of the opportunity to present to you some details about our proposal for a modified assessment as described in our May 31, 2005 letter. Our proposal provides Maryland's answers to the seventeen questions listed in your May 10, 2005 document, *Accountability for Students with Disabilities: Accountability Plan Amendments for 2004-05.* We believe that our plan for a modified assessment will help Maryland improve the quality and accuracy of our accountability plan. We look forward to your feedback to our proposal and for future support the Department has promised to states pursuing the modified assessment option. With this letter, we are requesting permission to move forward with the development of a modified assessment that would meet all of the specifications USDE has outlined for those assessments.

We are implementing the interim flexibility, which you recently granted to us for the 2004-2005 Adequate Yearly Progress designation process and for School Improvement decisions for the 2005-2006 school year. We have also begun discussions with experts on how to begin development of modified achievement and content standards and associated modified assessments that would complement our current assessment system.

We believe we meet the seventeen preconditions for approval and provide our responses to these questions in our attached proposal.

Again, we are grateful for USDE's support of Maryland and for your staff's assistance in helping us refine our accountability provisions as we work to improve student achievement for all of our students. If you find areas of our proposal are in need of clarification or modification, we will be happy to work with your staff to achieve approval.

Page 2 Mr. Raymond Simon June 14, 2005

Please contact me or Dr. Ronald Peiffer, Deputy State Superintendent for Academic Policy, at 410-767-0473 if you have any questions.

Sincerely,

Nancy S. Grasmick

State Superintendent of Schools

NSG:sks

Attachment

c: Meredith Miller, U.S. Department of Education

Maryland State Department of Education

Proposal

Developing A Modified Maryland School Assessment Based on Modified Achievement Standards for Students with Disabilities

Submitted To United States Department of Education June 15, 2005

MARYLAND STATE DEPARTMENT OF EDUCATION PROPOSAL Developing A Modified Maryland School Assessment Based On Modified Achievement Standards for Students with Disabilities

Introduction

Maryland plans to develop a Modified-Maryland School Assessment (Mod-MSA) for reading and mathematics assessments in grades 3-8. The proposed modified assessments will be ongrade-level versions of the existing MSA and would measure the content standards appropriate to the assigned grade level for a student. However, we anticipate that the content coverage and cognitive demand of the Mod-MSA will be somewhat reduced as appropriate. For each grade level, we will be examining the existing content standards for the MSA and making modifications to those standards. Conceptually, students taking the Mod-MSA will always then be tested on grade level. However, the decision for a student to participate in the Mod-MSA instead of the MSA will always be made through the student's IEP team process.

As with Maryland's content standards development process with other assessments, the modified content standards will be developed with full stakeholder engagement. Our psychometric council has examined the Maryland School Assessment and the research surrounding modified standards and believes that this assessment can be developed, though with some challenge, by the 2006 assessment administraton. Throughout the assessment planning period, we will be exploring the existing research further. However, it currently appears that the assessments developed would essentially be a modified version of the existing grade-level assessments. The psychometric council advises us that the most viable model to be developed under this timeline involves reduced numbers of reading and math objectives with assessments coming from the lower range of cognitive demand.

Students participating in the Mod-MSA would have all of the assessment accommodations available as specified on their IEPs. While the accommodations are the same for all students with disabilities, only those students meeting the narrow eligibility criteria for Mod-MSA would be eligible to participate in the assessment. The special focus of these modifications to the assessment would be to assist the Mod-MSA test taker to access grade-level content in reading and math and demonstrate proficiency.

Maryland's high school students take end-of-course exams as a graduation requirement and to meet NCLB testing requirements. Consequently, we believe that these assessments would not be modified in the same way as the tests in grades three through eight would be modified. At this time, we believe that the High School Assessments would not be modified for students identified for the Mod-MSA assessments in elementary and middle school. It is more likely students will still be expected to demonstrate proficiency or passing on the end-of-course assessments, but perhaps on a fundamentally different (later) timeline than that of the typical high school student.

Summary of Modified Assessments Proposal

We believe that Maryland fully qualifies for the new flexibility because of the work that has been done to ensure accountability for all schools and school systems for NCLB. Maryland has established a minimum group size for subgroup accountability at five students. This minimum group size is the smallest in the nation and truly meets the intent of NCLB that no child is left behind. We believe that you will find this proposal supports our petition for the implementation of an alternate (modified) assessment based on modified achievement standards. Additional information may be found on the MSDE report card website, www.mdreportcard.org or by contacting Dr. Ron Peiffer at 410-767-0473.

We are requesting permission to begin work on the proposed modified assessment and expect that USDE will provide further guidance in this area. As in the past, we will be happy to modify our anticipated course of action in accordance with that forthcoming direction. Meanwhile, we would like to move forward with developing modified academic achievement standards and modified assessments for students with persistent academic disabilities and served under the Individuals with Disabilities Education Act based on our current understanding of USDE intentions.

Beginning as early as the 2005-2006 school year and no later than the 2006-2007 school year, Maryland would include the proficient scores from the modified assessments in calculating AYP and cap the scores at 2% of the total population testing proficient as indicated in your May 10, 2005 published papers. While we were awaiting your approval to pursue the development of modified assessments and standards, we began preliminary work on the assessments. Our preparations have included discussions with our psychometric experts, experts on IDEA, and experts in instruction and assessment of students with disabilities.

Maryland plans for modified assessments based on modified achievement standards to be in place no later than the 2006-2007 school year. The modified achievement standards will be aligned with the State's content standards, promote access to the general grade level curriculum, and reflect professional judgment on the highest achievement standards possible as required by 34 CFR §200.1(d).

Maryland has taken an aggressive approach to ensure that students with disabilities have access to the general grade level curriculum and are tested appropriately and that educators maintain high expectations for students with disabilities. Maryland will continue to use alternate assessments based on alternate achievement standards for students with the most significant cognitive disabilities. Proficient scores from these assessments will still be capped at 1% of the total tested population for making AYP decisions.

Details of Maryland's proposal for identification of qualifying students for the Modified MSA (Mod-MSA) are contained in *Attachment A: Identification of Students with Disabilities for the Mod-MSA*.

The following outlines how AYP calculations will be completed once the new assessments are implemented:

Proposed Permanent AYP Approach for 2006-2007

- To be used as early as spring 2006 and no later than the spring 2007 assessments and after.
- o 97% of students are still tested with MSA.
- 2% of students would now be tested with the Modified MSA (Mod-MSA).
- o 1% of students would continue to be tested with the Alt-MSA.
- MSA, Mod-MSA, and Alt-MSA results would be combined to determine the percent of students who are proficient in reading and mathematics.

Maryland's responses to the 17 questions contained in the May 10, 2005 USDE publication Accountability for Students with Disabilities: Accountability Plan Amendments for 2004-2005 follow. I. Core Principles.

The following five core principles, provided in our May 31, 2005 letter to USDE, clearly show Maryland's commitment to a quality assessment and accountability system.

- 1. Participation Rates for students with disabilities. In Maryland ALL students are required to participate in AYP assessments in either the primary or make-up test windows. Students who are absent from both testing windows are assigned the LOSS (lowest obtainable scale score) for the purpose of calculating AYP. Thus, 100% of students are included in accountability decisions. This is a powerful incentive for schools to fully include students with disabilities in instructional programs. Even when those students with disabilities who were assigned the LOSS were subtracted from the participation rate calculation, the participation rate of students with disabilities is 98%.
- 2. Availability of alternate assessments. Maryland's alternate assessment for students with the most significant cognitive disabilities is the Alternate Maryland School Assessment (Alt-MSA). In 2004-2005 the Alt-MSA was administered at grades 3-8 and 10 and student's reading and mathematics performance was determined. Maryland included Alt-MSA assessment technical documentation as part of the State's submission for the USDE Peer Review of state standards and assessments.
- 3. Reporting of results from alternate assessments. Alt-MSA scores in reading and math are used in school, school system, and State accountability decisions and reported on school, school system, and State report cards and on www.mdreportcard.org the state's online report card. Parent home reports for Alt-MSA are produced and distributed annually. In addition, at the start of the school year schools are asked to include parents in reviewing and identifying "mastery objectives" for their child's reading and math Alt-MSA portfolio and to also include parents in reviewing the end-of-school-year performance of their child on those mastery objectives.
- 4. Availability of appropriate accommodations for students with disabilities. Testing accommodations are described in Maryland's Requirements for Accommodating, Excusing, and Exempting Students in Maryland Assessment Programs. This document is available on the Web at http://marylandpublicschools.org/NR/rdonlyres/5F4F5041-02EE-4F3A-B495-5E4B3C850D3E/3911/AccommodationsDocument200405final1.pdf. It is reviewed and revised annually by Maryland State Department of Education staff in special education, instruction, and assessment. It is reviewed by the Psychometric Council (Maryland's Technical Advisory Committee) and published as both hard copy and electronic copy. It is used by IEP teams when determining appropriate accommodations. MSDE annually conducts audits of accommodations and monitors implementation during testing.
- 5. Minimum group sizes for making AYP decisions. Maryland uses 5 as a minimum group size for ALL AYP subgroup accountability decisions.

II. Student Achievement.

Student performance for students with disabilities for the 2002-2003, 2003-2004, and 2004-2005 school years has shown very good improvements. Please see the following charts outlining performance for students on both the Maryland School Assessment and the Alt-MSA, Maryland's alternative assessment for students with disabilities.

- 6. Student achievement in reading, for students with disabilities, 2002-2003 school year
- 7. Student achievement in mathematics, for students with disabilities, 2002-2003 school year
- 8. Student achievement in reading, for students with disabilities, 2003-2004 school year
- 9. Student achievement in mathematics, for students with disabilities, 2003-2004 school year

Student Performance Summary Maryland State Department of Education Special Education Student Performance Division of Accountability and Assessment Maryland School Assessment CRT Scores - Percent Proficient Report

Special Education

LEA	LEA Name	Grade	Subject	Special Ed Title	2003	2004	2005
					CRT Prof/Adv. Pct*	CRT Prof/Adv. Pct*	CRT Prof/Adv. Pct*
Α	All Public	03	Reading	Non Special Ed	62.4	74.7	78.5
	Schools		11.00	Special Ed	25	42.9	51.3
			Math	Non Special Ed	68.8	76.2	80.0
				Special Ed	37.1	42.1	49.5
		04	Reading	Non Special Ed		79.0	83.8
			3	Special Ed		47.3	56.0
			Math	Non Special Ed		73.9	80.1
				Special Ed		38.5	47.3
		05	Reading	Non Special Ed	70.2	72.8	78.0
		3,350.00		Special Ed	35.1	37.7	44.2
			Math	Non Special Ed	59.8	68.0	73.5
				Special Ed	23.3	29.6	36.0
		06	Reading	Non Special Ed		74.0	74.8
				Special Ed		29.2	32.7
			Math	Non Special Ed		55.5	65.0
				Special Ed		14.1	21.6
		07	Reading	Non Special Ed		72.8	71.9
				Special Ed		26.2	28.2
	1		Math	Non Special Ed		54.8	60.0
				Special Ed		14.5	17.9
		08	Reading	Non Special Ed	65.7	69.8	71.2
			1000	Special Ed	20.1	20.7	27.4
			Math	Non Special Ed	44.2	50.5	56.1
	-			Special Ed	8.3	10.8	16.9
		10	Reading	Non Special Ed	66.3	70.7	71.5
			100	Special Ed	21.6	27.1	28.6

Note: In 2003 the Alt-MSA was administered at 11th grade as MSDE transitioned to all test administrations at 10th grade. More information is available on the web at mdreportcard.org

III. Sound State Education Policies.

The May 10 publication from USDE calls for evidence and assurances that the following are in place as a demonstration that the state has implemented alternative assessments and is developing additional modified assessments for a limited group of students with disabilities. The following summarizes Maryland's evidence:

10. Document the technical quality of the alternate assessments for students with the most significant cognitive disabilities, if not previously completed.

Maryland's assessment system recently underwent the federally mandated peer review process, where the technical quality of all of the State's assessments, including the alternate assessments was reviewed. While we have not yet received the final report of the peer review, we believe we submitted adequate information to demonstrate the technical quality of our alternate assessments. See Enclosed Document: Alternate Maryland School Assessment 2003-2004 Technical Manual.

11. Develop criteria and guidance for IEP teams regarding the identification of students with the most significant cognitive disabilities and for setting appropriate proficiency expectations for those students.

The Alt-MSA assesses students with significant cognitive disabilities and their attainment of individually selected instructional-level reading and mathematics Mastery Objectives which are aligned with grade-level content Maryland Content Standards. These Mastery Objectives form the framework for the student's reading and mathematics instructional program.

Participation in the Alt-MSA is determined by the Individualized Education Program Team process. Students with disabilities in grades 3-8 and 10 must participate in either MSA or Alt-MSA. The decision as to which assessment is appropriate for an individual student is made by each student's IEP team. A student with a significant cognitive disability will participate in the Alt-MSA if he or she meets each of the following Alt-MSA Participation Guidelines criteria:

 The student is learning extended Maryland reading (at emerging, readiness, or functional literacy levels) and extended Maryland mathematics content standards objectives.

AND

 The student requires explicit and ongoing instruction in a functional life skills curriculum including personal management, community, recreation/leisure, career/vocational, communication/decision making/interpersonal.

AND

The student requires extensive and substantial modification (reduced complexity
of objectives and learning materials, and more time to learn) of general education
curriculum. The curriculum differs significantly from that of their non-disabled
peers. They learn different objectives, may use different materials, and may
participate in different learning activities.

AND

 The student requires intensive instruction and may require extensive supports, including physical prompts, to learn, apply, and transfer or generalize knowledge and skills to multiple settings.

AND

 The student requires extensive support to perform and participate meaningfully and productively in daily activities in school, home, community, and work environments.

AND

- The student cannot participate in the MSA even with accommodations.
- Students not meeting the criteria above will participate in the Maryland School Assessment, with or without accommodations, as appropriate, based on their IEP.
- Specific additional guidance for Local Accountability Coordinators is provided in the Alt-MSA 2006 Handbook. The MSDE Technical Assistance Bulletin #5 provides information and guidance to local school systems on "Implementing the Alternate Maryland School Assessment, Alt-MSA." This is distributed to all local school systems and is on the MSDE website.
- 12. Demonstrate that policies are in place to ensure inclusion of all students in the assessment system, as required by IDEA and NCLB.

Specific guidance is provided to local school systems through the state regulations, COMAR 13A.05.01 and .02. In addition, local accountability coordinators and directors of special education are provided guidance through memos related to participation on a regular basis. Information Update #1 was distributed to local school systems on May 18, 2005 and to nonpublic special education facilities and private schools on May 20, 2005.

Accommodation information is updated annually in the Requirements for Accommodating, Excusing, and Exempting Students in Maryland Assessment Programs, Revised in August 20, 2004. This manual provides clarification on student participation and test administration in addition to the use of accommodations for all students, including students with disabilities.

13. Provide training to IEP teams on State assessment guidelines and policies, as required under IDEA and NCLB regulations.

Local school systems are provided training and information through a wide range of opportunities, including:

- ✓ October Special Education/Early Intervention Leadership Conference
- ✓ Statewide Trainings on Reauthorization of IDEA '04- held on May 18, 20, June 2, and June 6, 2005

Specific training has been provided according to the following schedule:

ALTERNATE MARYLAND SCHOOL ASSESSMENT (Alt-MSA)

MSDE Training and Support $\,$ provided to the Baltimore City Public School System from January 2004 to May 2005

DATE	LOCATION	TOPIC	PARTICIPANTS
January 13, 2004	Paquin School	The Revision of Alt- MSA Mastery Objectives	Teachers/Test Examiners and Support Staff
February 10, 2004	Paquin School	Alt-MSA Work Session	Teachers/Test Examiners and Support Staff
October 1, 2004	BCPSS	Alt-MSA Training	Teachers/Test Examiners and Support Staff
January 18, 2005	Lois T. Murray	Alt-MSA Support	Teachers/Test Examiners
February 7, 2005	Lois T. Murray	Alt-MSA Support	Teachers/Test Examiners

Phone call and e-mail support was writing of mastery objectives, to administration of the Alt-MSA instructional connection to the standards from the Reading and Mathematics Voluntary State (VSC).	Administrators and the entent
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Statewide Training and Support provided to all Maryland school systems from January 2004 to May 2005

DATE	LOCATION	TOPIC	PARTICIPANTS	
May 26, 2004	Faulkner	Alt-MSA Facilitator	Alt-MSA Facilitators	
900000 9 7 1980	Ridge	Meeting		
August 26, 2004	Towson State	Special School	Teachers, Administrators and	
	University	Consortium	Paraprofessional staff from	
	3890		center based programs.	
September 1, 2004	JHU	Initial 2004 – 2005 Alt-	Local Accountability	
	Downtown	MSA Administration	Coordinators and Alt-MSA	
	Center	and Handbook Training	Facilitators	
September 8, 2004	Faulkner	Alt-MSA Training	Alt-MSA Facilitators	
-	Ridge Center	Follow-up session		
October 20, 2004	JHU/CTE	Alt-MSA Facilitator	Alt-MSA Facilitators	
		Meeting		
February 9, 2005	Faulkner	Alt-MSA Facilitator	Alt-MSA Facilitators	
- 15 - 5	Ridge Center	Meeting		

Additional specific site visits include:

- January 10 Baltimore City, Lois T. Murray
 Howard County
 - 12 MSB, Kennedy Krieger
 - 13 Stedwick ES-Montgomery Co., Margaret Brent, PG
 - 18 Lois T. Murray
 - 24 Caroline Co
 - 25 Wicomico
 - 26 Anne Arundel
 - 27 Dorchester, Talbot
 - 28 Harford, Ridge Ruxton-Baltimore Co
- February 1 Maryland State Board of Education
 - 2 Howard Co; Goucher College-graduate course presentations
 - 3 Baltimore Co
 - 8 Wicomico
 - 22 Dorchester
- June 6, 8 LACs and Alt-MSA Facilitators, LEA 24 Schools

A Statewide Summer Institute will be convened June 28, 29, 30 targeting Special Schools, Local Accountability Coordinators, and Local Directors of Special Education.

14. Train teachers on instructional interventions, including special education teachers and general education teachers with subject matter expertise, on how to work together, provide access to the general curriculum, and use data to improve student achievement.

The Maryland State Department of Education continues to offer trainings, workshops, online opportunities and ongoing professional development to Maryland general and special education teachers, principals, and other school system leadership to increase both the knowledge and skills needed to accelerate the academic performance of students with disabilities. The focus is on the development of content knowledge, use of effective instructional practices, and use of data to monitor progress.

Summarized in Attachment B: 2005 Workshops, Trainings and Documents re Training on Instructional Interventions for General and Special Education Teachers are 10 major initiatives that were conducted and/or disseminated during the 2004-2005 school year. These include:

- 1) Training on the Alternative Maryland School Assessment;
- 2) Training for State Technical Assistants Assigned to Schools in State Improvement;
- 3) Workshops for 27 Low Performing Middle School Teams;
- 4) Governor's Academies in Mathematics, English, Government and Biology;
- 5) Online Content Modules;
- 6) Professional Development Modules in English/Language Arts for Year 2 Improvement Schools (in development);

- 7) Collaborative Leadership Training for Reading, Special Education and Mathematics Supervisors;
- 8) Dissemination of Statewide Surveys on Reading and Mathematics Interventions in Use in Maryland Schools;
- 9) Passport to Success Demonstration Middle School Project Outreach to 100 Participants as well as Certified Coach Training; and
- 10) Teacher Recruitment and Training.
- 15. Conduct outreach to parents of students with disabilities to explain State testing policies. This outreach may take several forms, such as website documents; brochures for parent centers, schools, and districts; or training for parent liaisons. The Maryland State Department of Education maintains an ongoing program of outreach to parents in Maryland on our assessment program. Three websites provide a significant amount of information to parents:
 - 1) http://marylandpublicschools.org/ is our main Departmental website with links to other content and downloadable copies of print publications;
 - 2) http://mdreportcard.org/ is the site displaying our school, school system, and state assessment and accountability data. This website is especially designed to provide data in graphical format so that parents and professionals alike can access and understand school performance;
 - 3) http://mdk12.org/ is commonly referred to as our "School Improvement" website. It contains sample test items, content standards, and the Maryland Voluntary State Curriculum.

Links to some of the specific web content available for parents are as follows:

- Testing. A page providing a menu of information on testing http://www.marylandpublicschools.org/MSDE/testing/
- Alt-MSA. A specific page giving detailed information on Alt-MSA http://www.marylandpublicschools.org/MSDE/testing/alt_msa/
- Alt-MSA Handbook <u>http://www.marylandpublicschools.org/MSDE/testing/alt_msa/2004_2005_A</u> <u>LT_Handbook</u>
- English Language Arts standards and assessments http://mdk12.org/instruction/curriculum/reading/index.html
- Mathematics standards and assessments http://mdk12.org/instruction/curriculum/mathematics/index.html
- Maryland School Assessments information http://www.marylandpublicschools.org/MSDE/testing/msa/

- Parent publications that are available on the web. Most have been distributed widely to parents and school system staffs.
 http://www.marylandpublicschools.org/MSDE/newsroom/publications/pubso ther/ Examples of some of the publications posted are as follows:
 - i. Sample MSA Home Reports
 - ii. A Parent's Guide to Achievement Matters Most
 - iii. Testing in Maryland: A parent's guide to the Maryland School Assessment for grades 3, 5, 8, and 10
 - iv. Information Sheet: MSA Reading
 - v. Information Sheet: MSA Mathematics
 - vi. Maryland School Assessment Questions and Answers
 - vii. MSDE Bulletin, various editions

• High School Assessment testing information http://www.marylandpublicschools.org/MSDE/testing/has/

- i. Maryland High School Assessments and Your Child
- ii. A Letter to Parents of Middle School Students, February 2005
- iii. How Will the HSA Affect Me?
- iv. Summary of requirements for the graduating classes of 2005-2008
- v. Summary of requirements for the graduating classes of 2009 and beyond
- vi. Frequently asked questions about high school graduation requirements
- vii. Encouraging Achievement in Your Child
- viii. State Board of Education Resolution (charging a State task force to investigate comparable methods of measuring student achievement in HSA-tested subjects).
- ix. HSA Questions and Answers
- x. For Administrators: What to Look for in High School Classroom Instruction
- xi. High School Assessments: A Conversation with Maryland 2003 Teacher of the Year Darren Hornbeck (A video on High School Assessments that is available on our website.)

Meetings and focus groups addressing Statewide Assessment have been convened throughout the State. The State Special Education Advisory Committee includes parents, advocates, and persons with disabilities. In addition, the MSDE convened focus groups to address the impact of statewide assessments and the impact on students with disabilities.

MSDE implements a concerted outreach to parents of students with disabilities to involve them in the development of support materials and to inform parents and advocates about the Statewide assessment system. Parents are represented on the Alt-MSA Stakeholder Advisory Committee. MSDE has developed and made available several resources that parents/guardians may access, including: a brochure that describes the Alt-MSA, a newly released videotape describing Alt-MSA that will be sent to every school, and the Alt-MSA Handbook and content standards that are posted on the MSDE Home Page.

Parents are included in focus groups at the local level to address issues raised through questions to local directors, phone calls to the Division of Special Education/Early

Intervention Services, and through parent letters. Representatives of the MSDE also meet regularly with members of the PTA. A Parent-Professional Partnership Course is available to parents through a local University to provide training and college credit for parents and professionals from the local level in a trainer of trainer model. An important aspect of this program is an overview of the statewide assessment system.

16. Incorporate appropriately the scores of students with the most significant cognitive disabilities into the State reporting and accountability system.

Maryland has fully incorporated the results of Alt-MSA administration in both the reporting and accountability systems. This information is displayed at http://mdreportcard.org/. AYP calculations for school year 2004-2005 will be available on June 20, 2005. Specific guidance is provided to local school systems through the state regulations, COMAR 13A.05.01 and .02.

17. Submit all alternate assessments for the Department's peer review process for standards and assessments.

Maryland submitted its Alt-MSA assessment to the United States Department of Education for peer review earlier this year as required by law. The formal report on the review has not yet been received by the Maryland State Department of Education. Maryland will submit its Mod-MSA for review when developed as per federal guidelines.

Additional Steps

Maryland additionally commits to the following steps as part of our overall strategy to improve assessments for students with disabilities, in particular for the development of alternate assessments based on modified achievement standards:

- Develop and formally approve or adopt modified academic achievement descriptors.
 June 2005
 - Meet with MSDE reading, mathematics and special education staff to produce first draft of modified grade level content standards.
 - Assemble and meet with Modified Assessment Test Specifications Committee to review overall plan and draft of modified content standards.

July 2005

- Stakeholder groups review draft modified content standards.
- Complete identification of modified content standards and present to State Board of Education.
- Build a framework, including purpose and scope of alternate assessments based on modified achievement standards, that addresses key questions and issues (e.g., portfolio or multiple choice) and is informed by stakeholder and technical advisory input.

June 2005

 MSDE staff met on June 10 with Maryland's Psychometric Council to review psychometric issues associated with a modified assessment, including expanded accommodations and modifications to testing.

- Meet with MSDE reading, mathematics and special education staff to produce first draft of modified grade level content standards.
- Assemble and meet with Modified Assessment Test Specifications Committee to review overall plan and draft of modified content standards.

July 2005

- Complete identification of modified content standards and present to State Board of Education.
- Review with testing vendor and special education/content staff the grade level assessments in reading or math against modified content standards to determine those assessment questions that are aligned with the modified content standards.
- Complete and publish MSA Test Modifications document along with updated Accommodations document. Particular focus will be on modifications related to reading/accessing grade level content passages.

August 2005

- Complete work with MSA test vendors and Mod-MSA test specifications team on reading and mathematics modified assessments.
- Contract for the development of valid alternate assessments based on modified
 achievement standards for students with disabilities who need to take a modified
 assessment (as well as students with the most significant cognitive disabilities, if
 applicable).

June 2005

 Begin meeting with MSA testing vendors to begin discussions on implementation of Mod-MSA including design and out-of-scope contract issues.

July 2005

Review with testing vendor and special education/content staff the grade level
assessments in reading or math against modified content standards to determine
those assessment questions that are aligned with the modified content standards.

August 2005

- Complete work with MSA test vendors and Mod-MSA test specifications team on reading and mathematics modified assessments.
- Establish (with diverse stakeholder involvement) and formally approve or adopt modified achievement standards with "cut scores" that differentiate among achievement levels and are aligned with State content standards.

July 2005

- Stakeholder groups review draft of modified content standards. (See Attachment C: Assessment Stakeholder Outreach.)
- Complete identification of modified content standards and present to State Board of Education.

 Document the technical quality of the alternate assessments based on modified achievement standards.

Fall 2006

- Complete Mod-MSA technical report.
- Demonstrate that policies are in place to ensure inclusion of all students in the assessment system, as required by IDEA and NCLB.

Specific guidance is provided to local school systems through the state regulations, COMAR 13A.05.01 and .02. In addition, local accountability coordinators and directors of special education are provided guidance through memos related to participation on a regular basis. Information Update #1 was distributed to local school systems on May 18, 2005 and to nonpublic special education facilities and private schools on May 20, 2005.

Accommodation information is updated annually in the Requirements for Accommodating, Excusing, and Exempting Students in Maryland Assessment Programs, Revised in August 20, 2004. This manual provides clarification on student participation and test administration in addition to the use of accommodations for all students, including students with disabilities.

The complete timeline of activities related to the development of the Modified Maryland School Assessment (Mod-MSA) based on modified achievement standards follows.

Timeline for Development of Modified Maryland School Assessment Mod-MSA

May 2005

- · Met with MSDE staff and LEA special education directors to discuss options
- State Board of Education approves request to design modified assessment.

June 2005

- MSDE staff met on June 10 with Maryland's Psychometric Council to review psychometric issues associated with a modified assessment, including expanded accommodations and modifications to testing.
- Meet with MSDE reading, mathematics and special education staff to produce first draft of modified grade level content standards.
- Assemble and meet with Modified Assessment Test Specifications Committee to review overall plan and draft of modified content standards.
- Begin meeting with MSA testing vendors to begin discussions on implementation of Mod-MSA including design and out-of-scope contract issues.

July 2005

- Stakeholder groups review draft of modified content standards.
- Complete identification of modified content standards and present to State Board of Education.
- Finalize and distribute rubric for identifying students eligible for modified test and begin LEA training.
- Review with testing vendor and special education/content staff the grade level
 assessments in reading or math against modified content standards to determine
 those assessment questions that are aligned with the modified content standards.
- Complete and publish MSA Test Modifications document along with updated Accommodations document. Particular focus will be on modifications related to reading/accessing grade level content passages.

August 2005

- LEAs begin to identify "2%" students as per state guidelines.
- Complete work with MSA test vendors and Mod-MSA test specifications team on reading and mathematics modified assessments.

September 2005

- Meet with Local Accountability Coordinators to review Mod-MSA design (LACs manage assessments in each of Maryland 24 school system).
- Begin meetings with school system staff, stakeholder groups, and special education community to ensure familiarity with Mod-MSA.

October 2005

- Vendor reprograms scoring applications for the modified assessments.
- Complete design work on Mod-MSA Examiners Manual and Testing and Coordinating Manual (TACM).

March 2006

• Administer MSA, Alt-MSA and new Modified assessments: begin scoring.

May 2006

 Distribute Mod-MSA data to standard setting vendor for development of book marking materials.

June 2006

• Calculate AYP as per normal timeline with all but 2% students. Recalculate AYP with 2% students when State Board approves achievement standards.

July 2006

- Complete booking marking for Mod-MSA achievement standards.
- Request State Board of Education approval of standard setting cut scores.
- Complete AYP recalculations; add modified assessment scores to online report card.
- Produce Mod-MSA home reports for distribution to LEA and parents.
- Begin research studies addressing reliability and validity and continue through fall and winter.

Fall 2006

Complete Mod-MSA technical report.

Attachment A

Identification of Students with Disabilities for the Modified-Maryland School Assessment and Interim Plan

In Maryland, consistent with IDEA and the requirements of the Individuals with Disabilities Education Act and Section 1111 of the Elementary and Secondary Education Act (No Child Left Behind Act), all students with disabilities are included in all general state and district wide assessments. IDEA emphasizes providing students with disabilities access to the general curriculum and to educational reforms as an effective means of ensuring better results. All students, including students with disabilities, are expected to receive instruction consistent with Maryland's Voluntary State Curriculum (VSC), based on the Maryland Content Standards and Core Learning Goals, and must be assessed on their attainment of grade level reading and math content. To determine adequate yearly progress (AYP) under NCLB, all students, including students with disabilities, are assessed in reading and math in grades 3 through 8, and during the high school grade.

Alternate assessments must be available for those students who cannot participate in the MSA with accommodations as indicated in their IEPs. Any alternate assessments must be available for students with disabilities consistent with the State's academic content standards. The alternate assessments include the following:

- Alt-MSA for students with significant cognitive disabilities who are participating on alternate academic achievement standards (limited to reporting 1% of those scoring proficient); or
- Mod-MSA (Modified MSA) for students with academic disabilities who with access to the general education curriculum will participate in modified academic content and achievement standards (limited to reporting 2% of those scoring proficient).

Summary of Revised Federal Policy Alternate Assessments for Students with Disabilities (Based in U. S. Department of Education documents released 4/7/05 and 5/10/02)

<u>Policy</u> "State may develop modified academic achievement standards and use alternate assessments based on those modified achievement standards for students with persistent academic disabilities and served under the Individuals with Disabilities Education Act. States may include proficient scores from such assessments in making adequate yearly progress (AYP) decisions but those scores will be capped at 2.0% of the total tested population. This provision does not limit how many students may be assessed against modified achievement standards."

Maryland's Implementation Procedures:

Students with disabilities are to participate and progress in the general education curriculum. It is the responsibility of each student's IEP team to consider accommodations, supplementary aids, services, and supports to enable the student to participate and progress in the general curriculum with non-disabled peers to the maximum extent appropriate.

The Maryland State Department of Education has met with local directors of special education as well as parents and advocates to develop and review the process for identification of students with disabilities who may be eligible to participate in the Mod-MSA. Consistent with the requirements of the individualized education program (IEP) process, the IEP Team would apply the proposed policy (C.1) and the attached rubric (C.2) to a review of the IEPs to determine that

the students identified as eligible would be identified based on their individual evaluation information and the instructional and service information on their IEPs. To ensure that the students eligible to participate in the Mod-MSA have received access to the general curriculum and content standards, a rigorous process has been developed, reviewed, and revised to reflect the federal guidance.

Specific types of interventions are to be documented by the IEP Team to ensure direct instruction in reading and mathematics on the Maryland Content Standards, as well as individualized instruction using scientifically based models. In addition, other models of instruction and professional development for staff are to include:

- Response to interventions models which are research-based and focus on individual instruction for students with disabilities in reading and math;
- Professional development with an emphasis on coaching and mentoring;
- Availability of co-teaching models with general and special education teachers providing access to the general curriculum and core content.

Attachment A.1 [Proposed Guidelines for Local School Systems]

Identification of Students with Disabilities for Participation in Mod-MSA

The Modified Maryland School Assessment (Mod-MSA) is based on modified academic content standards for students with disabilities. These are students who are not proficient, even with full access to the general education curriculum. These students will be able to be assessed using modified assessments based on those modified academic content standards. Students who participate in the Mod-MSA in grades 3-8 and score proficient will be capped at 2%.

Mod-MSA results are to be reported at three proficiency levels (Basic, Proficient, and Advanced) as part of the State accountability program. Results from the Mod-MSA will be aggregated with those from the MSA and Alt-MSA for accountability purposes.

Mod-MSA Participation Guidelines

Students with disabilities in grades 3-8 must participate in either MSA, Mod-MSA, or Alt-MSA. Each student's IEP team will make the decision as to which assessment is appropriate for an individual student. A student who will be instructed and assessed using modified academic content standards must meet <u>each</u> of the following criteria:

 The student is learning using modified academic content standards in reading and mathematics.

AND

• The student requires <u>modifications</u> during assessments and <u>instruction</u>, in addition to accommodations. These testing/assessment and instructional modifications may include: reduced complexity of language, reduced number of test items, reduced amount of content to learn, paraphrasing of reading passages, embedded scaffolding for a written response such as sentence stems, guided response outline, guided questioning to generate response, software such as Co-Writer and Write Outloud, use of calculator, and spell check.

AND

 The student requires the use of a modified general curriculum. The curriculum for the student is aligned with the Maryland Content Standards for the student's grade level but is modified (reduced amount to learn, reduced complexity, reduced output) so the student can access the content and demonstrate what he/she has learned.

AND

The student must have had at least three consecutive years of individualized intensive
instruction in reading and mathematics consistent with his/her IEP (beginning with the most
recent), and although progress toward grade level standards was made, he/she is not making
progress at grade level.

AND

• The student must demonstrate that his/her cannot attain proficiency in actual grade level MSA, even with accommodations.

Attachment A.2 [For use by school-based IEP Teams]

IEP Team Decision-Making Model

This decision-making model should be utilized by IEP Teams in schools that did not meet AYP (during the 2004-2005 administration of the MSA) based solely on special education as a subgroup, if the local school system determines it will appeal AYP for individual schools. For students with IEPs enrolled in these schools, IEP Team meetings must be convened prior to the end of this current school year. The purpose of this IEP Team meeting is to utilize the IEP Team Decision-Making Model to consider the student's eligibility and participation in Mod-MSA. Beginning with the 2005-2006 school year, students who meet the criteria below may be eligible to participate in the Mod-MSA program.

The IEP Team must determine if:

- ✓ The student is learning using modified academic content standards in reading and mathematics.
- The student requires modifications during assessments and instruction, in addition to accommodations. These testing/assessment and instructional modifications may include: reduced complexity of language, reduced number of test items, reduced amount of content to learn, paraphrasing of reading passages, embedded scaffolding for a written response such as sentence stems, guided response outline, guided questioning to generate response, software such as Co-Writer and Write Outloud, use of calculator, and spell check.
- The student requires the use of a modified general curriculum. The curriculum for the student is aligned with the Maryland Content Standards for the student's grade level, but is modified (reduced amount to learn, reduced complexity, reduced output) so the student can access the content and demonstrate what he/she has learned.
- The student must have had at least three consecutive years of individualized intensive instruction in reading and mathematics consistent with his/her IEP, and although progress toward grade level standards was made, he/she is not making progress at grade level.
- ✓ The student must demonstrate that he/she cannot attain proficiency in their actual grade level MSA, even with accommodations.

In addition the IEP Team is required to respond to the following in detail:

- Alt-MSA: This student is <u>not</u> eligible to participate in the Alt-MSA.
 - □ Yes
 - □ No
- **General Curriculum**: How the student's disability affects involvement and progress in the general curriculum.

		List page of IEP that reflects this consideration								
•	rec	odified General Curriculum: The goals and objectives on the student's IEP quire a modified general curriculum in: Reading List pages of IEP that reflect modifications Math List pages of IEP that reflect modifications								
•	the ass sul	rade Level Proficiency: The instructional performance grade levels identified on a IEP, as measured by formalized assessment instruments or district-wide sessments that are designed for standardized assessment of achievement, are bestantially below grade level. Yes No								
•	Co	ontent Standards: The goals on the student's IEP are aligned with the Maryland ontent Standards. Reading List IEP pages that reflect these goals Math List IEP pages that reflect these goals								
•	General Education Interventions: The following instruction, general education interventions, and special education and related services have been provided to the student: Instruction in the general education curriculum for number of years. Intensive reading interventions have been provided for years. List school-based intervention									
	_ _	Intensive mathematics interventions have been provided for years List school-based intervention								
	0	List related services provided: Service Years Frequency Service Years Frequency Service Years Frequency Frequency								
	0	Student has received special education instruction provided by qualified special education personnel outside the regular classroom fornumber of years								
		and hours per day. One to one special education instruction with qualified special education personnel for number of years and hours per day.								

		Resource room instruction by qualified special education personnel forhours per day.			
		Other research-based interventions provided to the student, including:			
•	the	de Level Progress: The student made progress toward grade level standards in following areas and is not performing at grade level in the following areas: Reading Math			
•	ins	ruction: The student has had at least three years of individualized intensive ruction consistent with the IEP in the following areas:			
		Reading List years that reading goals are included in IEP Math List years that math goals are included in IEP			
•	acc	ommodations: During instruction /assessment the student receives ommodations as indicated on the IEP in the area of: Reading List pages of IEP that reflect accommodations Math List pages of IEP that reflect accommodations			
 Supplementary Aids and Services: The student has been provided with supplementary aids and services as indicated on the IEP in the areas of: Reading List pages of IEP that reflect supplementary aids and services Math List pages of IEP that reflect supplementary aids and 					
		ing each of the above criteria with supporting documentation and not not the Alt-MSA will participate in the Mod-MSA.			
Date:					
Jurisdictio	n: _				
School: _		Grade:			
Student Na	ame	ID #:			
D.O.B					
IEP Team	Cha	r:			
Team Mer Ge		Education Teacher:			

Special Education Teacher:	
Individual to Interpret Assessment Results:	
Parent/Guardian:	
Others:	

2005 Workshops, Trainings and Documents re Training on Instructional Interventions for General and Special Education Teachers

Division of Special Education/Early Intervention Services Maryland State Department of Education, June 2005

1. 27 Intensive Trainings for Teachers in Student and Teacher Preparation to Administer the Alt-MSA

C 1 1	A 14 N ACI A	11+ +-	T1	Accountability	Canadinatana	J A 1+ N /C A	Parilitates
Seni	A II-IVINA	rollolli io	Local	Accountantity	Coordinators	and All-IVINA	Facilitators

Sept 2 Alt-MSA rollout to Non-Public schools

Sept 8 Alt-MSA Facilitator meeting

Sept 9 Baltimore County presentation to staff

Sept 15 Frederick Co presentation to staff

Sept 16 Benedictine School presentation to staff

Sept 17 LEA 24 presentation

Sept 21 Dorchester Co planning with staff

Sept 22 Prince George's Co presentation to staff

Sept 23 Southern MD School Psych presentation

Sept 24 LEA 24 presentation

Sept 30 Anne Arundel Co presentation to staff

Oct. 1 Baltimore City presentation to staff

Oct 21 Non-Public Schools presentation to staff

Oct 22 Montgomery County presentation to Placement Unit Staff

Oct 22 Kennedy Krieger meeting with staff

Oct 26 Presentation to Anne Arundel County advisory committee

Oct 27 Children's Guild-presentation to staff

Oct 27 Caroline County presentation to staff

Nov. 4 Howard County teachers presentation

Nov. 9 Montgomery County Education Association (MCEA)

Nov 18 Presentation at Maryland Assessment Group Conference (MAG)

Dec. 1 Somerset-Betsy Reich-Technical Assistance

Dec. 2 Local Directors presentation

Dec 13 Non-Public Schools presentation to Ed Directors

Dec 15 Talbot County presentation to staff

Dec 22 Montgomery County-2 associate superintendents, 3 directors, various supervisors, teacher's union president--planning and technical assistance

2. Training On How To Improve Performance Of Students With Disabilities To The State Technical Assistants Assigned To Work With Schools In State Improvement

Staff from the Student Achievement and Results Branch provided professional development to 44 Maryland State Department of Education Technical Assistants and LEA School Improvement contact personnel on September 23, 2004. The MSDE Technical Assistants provide direct professional development to teachers and other staff at MSDE identified schools in improvement.

The professional development focused on Maryland School Assessment data and the need to analyze and use data for decision making to improve the academic performance of students with disabilities. Best practices were shared from a school that has successfully identified and implemented strategies to provide differentiated learning experiences for diverse learners. Background information of diversifying instruction and resources for teaching strategies and techniques were shared.

3. Training To 27 Low Performing Middle Schools That Are Participating In A State-Funded Program, Known As I-PAS. Improving Proficiency Of All Students

In April 2005, we provided professional development to more than 75 middle school teachers and administrators from schools participating in the 2004-2005 I-PAS/Challenge program. The outreach focused on using the Voluntary State Curriculum (VSC) to help students with disabilities meet state standards. Participants engaged in guided practice using the VSC to "backmap" to identify pre-requisite skills that need to be taught before students can access the grade-level VSC indicators and objectives. Examples of sample products for assessment limits were provided. School teams engaged in activities evaluated the collaborative practices in place at their school and brainstormed to determine next steps for improving reading. In addition, participants received resource packets detailing specific strategies for accommodations and modifications. A packet of information provided, including resource materials and the curriculum training packet are included. All materials were also sent electronically to all participants.

In addition to providing new knowledge and skills to the participants, the professional development was a trainer-of-trainers activity for some of the schools or local school systems that identified scaffolding and knowledge of prerequisite skills as a need for staff.

5. Governor's Academies Are Available Statewide And Held Regionally.

Governor's Academies in the content areas of Mathematics, English, Social Studies (Government), and Science (Biology) are under development and currently accepting registrations from general and special educators to attend two-week academies.

The purposes of the Academies are:

• to improve participants knowledge of content subject matter and pedagogy to assist students in improving achievement and performance on the HSA.

- · develop a network of teachers who can share instructional strategies and effective lessons
- provide ongoing professional development during the school year with coaching and mentoring provided to participants.

6. Online Modules Are Available For Statewide Use

There are currently two, online web-enhanced "trainer of trainer" modules, one in social studies (American Government), and one in mathematics (Algebra/Data Analysis). Eight districts have been trained and have incorporated the web-enhanced into their instructional delivery process. Social studies is currently identifying their "trainer of trainers" which are to include an instructional technology specialist, a special education teacher, a central office content specialist and other (ELL suggested), as was previously done in math. These modules serve as additional curriculum resources.

7. Professional Development Modules Will Be Available For Statewide Use Beginning With Schools In Year Two Of Improvement

Currently under development are English/language arts instructional modules that engage participants in using the voluntary state curriculum in planning for instruction, making the instruction more accessible to students with disabilities, and strategizing for embedding scaffolded instruction into the planning/instructional delivery process to address diverse learning needs.

8. Collaborative Leadership Training

Collaborative briefings for English/Language Supervisors and Directors/Supervisors of Special Education, and Mathematics Supervisors/Directors/Supervisors of Special Education were held to provide strategies for; improving accessibility to the general education curriculum for students with disabilities, differentiating instruction to address diverse learning needs, and collaborating for more effective instructional planning and delivery.

Conferences held jointly with Assistant Superintendents of Instruction and Special Education Directors have focused on researched based interventions that are effective with students with disabilities and the evaluation of the impact of professional development provided for staff.

9. Survey Of Reading And Math Curriculum Materials In Use For Students With Disabilities

At the request of local special education directors and our Reading First Office, STAR conducted a web-based survey of which reading interventions were being used by local school systems at the elementary, middle and high school levels. Reports were disseminated to all school systems with additional information about web contacts for the most frequently used reading intervention programs. The report was also distributed to assistant superintendents of instruction at our annual joint retreat with instruction and special education leadership from all 24 local school systems. Reading survey is included in this package of information.

We are currently completing a similar survey of math programs being used at both the core text level and for interventions. This survey also included information about the settings where students with disabilities are receiving math instruction.

Attachment C

Assessment Stakeholder Outreach

Representatives of the Maryland State Department of Education

- 1. Carol Ann Baglin, Assistant State Superintendent, Div. Special Education/Early Intervention Services (DSE/EIS), Chair
- 2. Tom Barkley, Transition Specialist, DSE/EIS
- 3. Sharon Hall, Section Chief, Alternate Maryland School Assessment Program, DSE/EIS
- 4. Donna R. Riley, Policy & Resource Specialist, DSE/EIS
- Susan Schaffer, Director, Work Force Technology Center, Division of Rehabilitative Services (DORS)

Representatives of Local School Systems, including General and Special Educators, Administrators, Board Members, Student Services, Guidance Counselors, and Transition Specialists

- 6. Ellen Schaefer, Supervisor, Department of Special Education, Montgomery County Public Schools
- 7. Dr. Karen Salmon, Superintendent Talbot County Public Schools,
- Mr. James Lupis, Executive Director, Public School Superintendent Association of Maryland (PSSAM)
- 9. Mr. Allan Gorsuch, Director, Eastern Shore of Maryland Education Consortium
- 10. Jim Dryden, Executive Director, Maryland Association of Elementary School Principals (MAESP)
- 11. Clara Floyd, President, Maryland State Teachers Association (MSTA)
- 12. Michael Galassi, Special Services Vice President, Baltimore Teachers Union (BTU)
- 13. Sue Ann Tabler, Executive Director, Maryland Association of Secondary School Principals (MASSP)
- 14. Carl Smith, Executive Director, Maryland Association of Boards of Education (MABE)
- 15. Stacey Kopnitsky, Executive Director, Maryland Middle School Association (MMSA)
- 16. Roberta Strosnider, President, Maryland Chapter of Council of Exceptional Children (MD-CEC)
- 17. Helena Davis, Local School System Transition Specialist, Baltimore City Public Schools
- 18. Dr. Jodi French, Director, Special Education Services, Cecil County Public Schools
- 19. Pamela Pencola, Director, Special Education, Frederick County Public Schools
- 20. Bonnie Walston, Supervisor, Special Education, Wicomico County
- 21. Diane Black, Director, Special Education, Anne Arundel County Public Schools
- 22. Bobbie Pedrick, Special Education, Anne Arundel County Public Schools
- 23. Patty Daley, Coordinator, Special Education, Howard County Public Schools
- 24. Judy Glass, Director, Special Education, Baltimore County Public Schools
- 25. Mr. Wade Blair, Guidance Counselor, Mary Moss Academy, Anne Arundel County Public Schools
- 26. Cydney Wentsel, Supervisor of Guidance and Counseling, Harford County Public Schools

Representatives of Nonpublic Special Education Facilities

- 27. Dorie Flynn, MANSEF
- 28. Revanette Gilmore, Villa Maria
- 29. Dr. Addys Karunaratne, Foundation School
- 30. Dr. Robin Church, Kennedy Krieger School
- 31. Gabrielle Miller, Kennedy Krieger School

Representatives of Advocacy Communities

- 32. Dr. Karen Rigamonti, Chairperson, Special Education State Advisory Committee (SESAC)
- 33. Catriona Johnson, Director, Public Policy Initiatives, Developmental Disabilities Council (DDC) Dr. Carol Quirk, Maryland Coalition for Inclusive Education (MCIE)
- 34. Diane Sakwa, Families Involved Together, Inc.
- 35. Leslie Seid-Margolis, Maryland Disability Law Center
- 36. Jane Walker, Maryland Children's Mental Health Coalition
- 37. Jim McComb, Maryland Association of Resources for Families and Youth (MARFY)
- 38. Theresa LeMaster, Parent, U of MD Clinical Law Program 1/20 only
- 39. Diane Cheslea, Learning Disabilities Association
- 40. Linda Spencer, Children and Adults with Attention-Deficit/Hyperactivity Disorder (CHADD) 1/20 only

Representatives of Other State Agencies

- 41. Jade Gingerich, Maryland Department of Disabilities (MDOD)
- 42. Elliott Schoen, Office of the Attorney General