

UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

ASSISTANT SECRETARY

MAY 3 2010

The Honorable Nancy Grasmick
State Superintendent of Schools
Maryland State Department of Education
200 West Baltimore Street
Baltimore, Maryland 21201

Dear Superintendent Grasmick:

Thank you for submitting Maryland's graduation rate information for peer review in accordance with 34 C.F.R. § 200.19(b)(6)(i). I appreciate the efforts that were required to prepare for the peer review that occurred in February 2010. After careful review and consideration of Maryland's submission as well as the feedback received from the peer reviewers, I am pleased to approve Maryland's proposed graduation rate goal and targets for use in making adequate yearly progress (AYP) determinations based on assessments administered in the 2009–10 and 2010–11 school years. The approved goal and targets are set forth in Section 7.1 of Maryland's amended Accountability Workbook, which you recently submitted to the U.S. Department of Education (Department) and which will be posted on the Department's website.

My staff and I will continue to review other aspects of your graduation rate peer review submission and, if we have any questions or concerns, we will contact you in the near future. Enclosed is a copy of the peer review comments, which I took into consideration in my decision to approve Maryland's graduation rate goal and targets. If you have any questions or would like to discuss further, please do not hesitate to contact Victoria Hammer at Victoria.Hammer@ed.gov or Vicki Robinson at Vicki.Robinson@ed.gov.

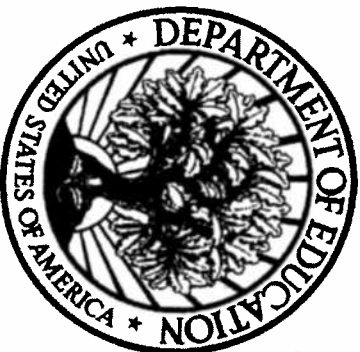
Sincerely,

Thelma Meléndez de Santa Ana, Ph.D.

Enclosure

cc: Governor Martin O'Malley
Sandy Shepherd

Maryland
Graduation Rate Peer
Review Report Template
February 16-18, 2010



United States Department of Education
Office of Elementary and Secondary Education

Final Regulations (34 C.F.R. 200.19)
issued under Title I, Part A of the
Elementary and Secondary Education
Act (73 FR 64436 October 29, 2008)

Completing the Report Template

Guidance to Graduation Rate Peer Review Teams

Phase I: Preliminary Review

- Step 1.** Refer to the state education agency's (SEA's) Graduation Rate Excel Worksheet and, if provided, supplemental evidence.
- Step 2.** Record the state's name on page 4.
- Step 3.** The report template begins with Sections 1, 2, and 5 from the excel worksheet. These sections provide context for how the state is currently calculating its graduation rate and are intended to help inform the U.S. Department of Education's (Department's) and the peer reviewers' understanding of the state's proposed goal and targets. Examine the information and evidence provided for each indicator and record on the template whether or not the state has provided sufficient information/adequately answered the question¹. In the "Comments" column, record your impressions of the information provided for each indicator, including topics needing clarification/questions regarding the information provided and what you perceive as particularly compelling or strong responses or weaker responses. This information will also serve to help you remember key issues when you discuss the submissions in small groups on-site.
- Step 4.** The report template continues with Sections 3 and 4 from the excel worksheet. These sections provide the state's proposed goal and targets and the graduation rate for the high school(s) in the state at the 10th, 50th, and 90th percentile ranked in terms of graduation rate. Examine the information and evidence provided for each indicator and record on the template whether or not the state has provided sufficient information/adequately answered the question¹. In the "Comments" column, note your impressions of the information provided, including topics needing clarification/questions regarding the information provided and what you perceive as particularly compelling or strong responses or weaker responses. This information will also serve to help you remember key issues when you discuss the submissions in small groups on-site.

- Step 5.** The report template ends with the summary of each main section. First, indicate, overall, whether the state has provided sufficient information for each section. In the "Comments" column, note overall impressions of the information provided for

¹If "No," annotate what is missing in the "Comments" column. Sufficient information may include the following: guidance that the state provides to schools and districts; impact data; memoranda or board minutes; state board determinations/rulings or links to such documents; state law or links to applicable provisions. For example, some questions may simply require a "Yes" or "No" response; others may require supporting documentation.

each section, including topics needing clarification/questions regarding the information provided and what you perceive as particularly compelling or strong responses or weaker responses. This information will also serve to help you remember key issues when you discuss the submissions in small groups on-site.

Phase II: Team Review

- Step 1.** Organize the SEA's Graduation Rate Excel Worksheet and supplemental evidence and assign a recorder. Recorders will complete the team's report template.
- Step 2.** For Sections 1, 2, and 5 review each indicator and identify those for which all reviewers recorded the state as submitting sufficient information/adequately answering the question. Note these indicators and provide any relevant group comments.
- Step 3.** For Sections 1, 2, and 5, discuss amongst team indicators for which reviewers differed in recording the state as submitting sufficient information/adequately answering the question. After discussion, indicate whether or not reviewers came to consensus and, if not, how many reviewers do or do not believe the information is sufficient. Provide any relevant group comments.
- Step 4.** Repeat Step 2 and Step 3 for Sections 3 and 4 and the summary section.
- Step 5.** Complete the "Overall General Impressions of Submission" section. This may include areas of strength and weakness in the submission.
- Step 6.** Print a copy of the draft report and conduct an editorial review to ensure correct evidence references, narrative statements, and summaries reflective of the comments of the team.

State: Maryland

¹If "No," annotate what is missing in the "Comments" column. Sufficient information may include the following: guidance that the state provides to schools and districts; impact data; memoranda or board minutes; state board determinations/rulings or links to such documents; state law or links to applicable provisions. For example, some questions may simply require a "Yes" or "No" response; others may require supporting documentation.

**Graduation Rate to Be Used for Adequate Yearly Progress (AYP)
Determinations Based on Assessments Administered in 2009-10**

Section 1. The graduation rate definition that the state will use to determine AYP based on school year 2009-10 assessment results. [34 C.F.R. § 200.19(b)(6)(i)(A)]

Indicator	Does state provide sufficient information/adequately answer question? ¹	Comments including concerns, questions, and areas of strength regarding information provided.
A. Provide the actual formula that will be used.	Yes	Information in this section is clear with appropriate supporting documentation.
B. Provide a description of the students who will be counted in the numerator and denominator for that formula.	Yes	
C. Does the rate include only first-time 9th-graders? If Yes, how does the state ensure this? If No, what steps is the state taking to be able to do this and when will the state have that capacity?	Yes	
D. Are the data lagged?	Yes	
E. Are any students given extra time to attain a regular diploma (e.g., students with disabilities)?	Yes	
(E1) If Yes, what students are given extra time and how long are they given?	Yes	

¹If "No," annotate what is missing in the "Comments" column. Sufficient information may include the following: guidance that the state provides to schools and districts; impact data; memoranda or board minutes; state board determinations/rulings or links to such documents; state law or links to applicable provisions. For example, some questions may simply require a "Yes" or "No" response; others may require supporting documentation.

Indicator	Does state provide sufficient information/adequately answer question? ¹	Comments including concerns, questions, and areas of strength regarding information provided.
F. Confirm that only students attaining a regular diploma are counted as graduates.	Yes	
(F1) How does the state define a "regular diploma"?	Yes	
(F2) Does the state provide other types of diplomas or certificates? What are they? How are students who earn such alternate diplomas or certificates included in the graduation rate?	Yes	
(F3) How are GED recipients included in the graduation rate?	Yes	
G. Can the rate be calculated for every school and district with a grade 12 that awards diplomas?	Yes	
H. Can the rate be disaggregated at the school and district level for calculating whether every relevant subgroup (students from each major racial and ethnic group, economically disadvantaged students, limited English proficient students, and students with disabilities) made AYP through Safe Harbor?	Yes	
I. If the rate is a longitudinal adjusted-cohort model, how does the state track émigrés, transfers, and deceased students? What guidance does it provide to its districts?	No	Not addressed for 2011 and beyond implementation.

Progress at Implementing the Regulatory Four-Year Adjusted-Cohort Graduation Rate

¹If "No," annotate what is missing in the "Comments" column. Sufficient information may include the following: guidance that the state provides to schools and districts; impact data; memoranda or board minutes; state board determinations/rulings or links to such documents; state law or links to applicable provisions. For example, some questions may simply require a "Yes" or "No" response; others may require supporting documentation.

Section 2. A description of the progress the state is making toward meeting the deadline for calculating and reporting the four-year graduation rate on report cards providing assessment results for the 2010-2011 school year. [34 C.F.R. § 200.19(b)(6)(i)(B)]

Indicators	Does state provide sufficient information/adequately answer question? ¹	Comments including concerns, questions, and areas of strength regarding information provided.
<p>A. When was the data tracking system fully operational? What was the first 9th-grade class to be included in the data tracking system?</p>	Yes	Information in this section is clear with appropriate supporting documentation.
<p>B. Does the data tracking system contain information to identify each student by racial and ethnic group and by gender, as well as information to identify whether the student is a student with a disability, a limited English proficient student, an economically disadvantaged student, or a migrant student?</p>	Yes	
<p>C. What progress has the state made on the ten essential elements noted by the Data Quality Campaign? (Specify whether the state has completed each element below and, if not, what steps the state is taking to be able to complete the element and when the state will have that capacity.)</p>	Yes	
(C1) Statewide student identifier	Yes	
(C2) Student-level enrollment data	Yes	
(C3) Student-level test data	Yes	
(C4) Information on untested students	Yes	
(C5) Statewide teacher identifier with a teacher-student match	Yes	

¹If "No," annotate what is missing in the "Comments" column. Sufficient information may include the following: guidance that the state provides to schools and districts; impact data; memoranda or board minutes; state board determinations/rulings or links to such documents; state law or links to applicable provisions. For example, some questions may simply require a "Yes" or "No" response; others may require supporting documentation.

Indicators	Does state provide sufficient information/adequately answer question? ¹	Comments including concerns, questions, and areas of strength regarding information provided.
(C6) Student-level course completion (transcript) data	Yes	
(C7) Student-level SAT, ACT, and Advanced Placement exam data	Yes	
(C8) Student-level graduation and dropout data	Yes	
(C9) Ability to match student-level P-12 and higher education data	Yes	
(C10) State data audit system	Yes	

Use of an Extended-Year Adjusted-Cohort Rate in AYP Determinations Based on Assessments Administered in 2009-10

Section 5. If the state is proposing to use an extended-year adjusted-cohort graduation rate or rates in AYP determinations based on assessments administered in 2009–10, a description of how it will use that rate with its four-year adjusted-cohort graduation rate to determine whether its schools and LEAs have made AYP. [34 C.F.R. § 200.19(b)(6)(i)(F)]

Indicators	Does state provide sufficient information/adequately answer question? ¹	Comments including concerns, questions, and areas of strength regarding information provided.
A. Does the state propose to use more than one extended-year adjusted-cohort rate in AYP determinations? How many extended-year adjusted-cohort graduation rates does the state propose to use? Describe each one (e.g., a five-year and a six-year rate).		
B. For each proposed extended-year adjusted cohort rate:		

¹If “No,” annotate what is missing in the “Comments” column. Sufficient information may include the following: guidance that the state provides to schools and districts; impact data; memoranda or board minutes; state board determinations/rulings or links to such documents; state law or links to applicable provisions. For example, some questions may simply require a “Yes” or “No” response; others may require supporting documentation.

Indicators	Does state provide sufficient information/adequately answer question? ¹	Comments including concerns, questions, and areas of strength regarding information provided.
(B1) Provide the actual formula that will be used.		
(B2) Confirm that the rate conforms to the regulatory requirement for an adjusted-cohort graduation rate (i.e., does the state track émigrés, transfers, and deceased students, including those who enter or leave the school during the extended year or years? What guidance does it provide to its districts on how to do this?).		
(B3) Provide a description of the students who will be in the numerator and denominator for that formula.		
(B4) Are the data lagged?		
C. Submit evidence that the state's data system can support the extended-year graduation rates requested (i.e., that the longitudinal system has collected data for the required number of years to produce graduation rates for five years or more, if applicable).		
D. Confirm that only students receiving a regular diploma are counted as graduates.		
(D1) Does the state provide other types of diplomas or certificates? What are they? How are students who receive such alternate diplomas or certificates included in the graduation rate?		
(D2) How are GED recipients included in the graduation rate?		
E. Can the rate be calculated for every school and district with a grade 12 that awards diplomas?		

¹If "No," annotate what is missing in the "Comments" column. Sufficient information may include the following: guidance that the state provides to schools and districts; impact data; memoranda or board minutes; state board determinations/rulings or links to such documents; state law or links to applicable provisions. For example, some questions may simply require a "Yes" or "No" response; others may require supporting documentation.

Indicators	Does state provide sufficient information/adequately answer question? ¹	Comments including concerns, questions, and areas of strength regarding information provided.
<p>F. Can the rate be disaggregated at the school and district level for calculating whether every relevant subgroup made AYP via Safe Harbor?</p>		
<p>G. Confirm that the extended-year rate or rates use the same goal as the four-year rate.</p>		
<p>H. Do the targets for the extended-year rate or rates differ from the four-year graduation rate? If so:</p>		
<p>(H1) Do the targets vary by school or subgroup? If so, how? What criteria were used to set the differing targets?</p>		
<p>(H2) Provide examples for high schools with varying graduation rates and how the targets will apply.</p>		
<p>(H3) Provide a rationale for the selection of the annual targets and how they demonstrate continuous and substantial improvement from the prior year toward meeting or exceeding the state's goal.</p>		
<p>I. How will the state use the extended graduation rate (or rates) in AYP determinations?</p>		
<p>(I1) Provide an example of how a school might calculate whether it was making adequate yearly progress using the four-year and extended-year adjusted-cohort graduation rates.</p>		

¹If "No," annotate what is missing in the "Comments" column. Sufficient information may include the following: guidance that the state provides to schools and districts; impact data; memoranda or board minutes; state board determinations/rulings or links to such documents; state law or links to applicable provisions. For example, some questions may simply require a "Yes" or "No" response; others may require supporting documentation.

Goals and Targets

Section 3. The state's graduation rate goal and annual targets beginning with the 2009-2010 school year. An explanation of how the state's graduation rate goal represents the rate the state expects all high schools in the state to meet and how the state's annual targets demonstrate continuous and substantial improvement from the prior year toward meeting or exceeding the state's goal. [34 C.F.R. § 200.19(b)(6)(i)(C) and (D)]

Indicators	Does state provide sufficient information/adequately answer question? ¹	Comments including concerns, questions, and areas of strength regarding information provided.
A. What is the <u>single</u> statewide goal for the graduation rate used in AYP determinations based on 2009–10 assessment results?	Yes	State is commended for selecting a rigorous statewide goal.
B. Provide a rationale for the selection of the graduation rate goal and how it represents the rate the state expects all high schools in the state to meet.	Yes	Comprehensive process and rationale provided.
C. What are the targets for high schools that do not meet the graduation rate goal?	Yes	State describes clear process and reasonable targets for schools in each quartile.
(C1) Do the targets vary by school or subgroup? If Yes, how? What criteria were used to set the differing targets?	Yes	
(C2) Provide examples for high schools with varying graduation rates and how the targets will apply.	Yes	Good clear example to clarify approach.
D. Provide a rationale for the selection of the annual targets and how they demonstrate continuous and substantial improvement from the prior year toward meeting or exceeding the state's goal.	Yes	Clear rationale provided based on current performance with respect to state goals.

¹If “No,” annotate what is missing in the “Comments” column. Sufficient information may include the following: guidance that the state provides to schools and districts; impact data; memoranda or board minutes; state board determinations/rulings or links to such documents; state law or links to applicable provisions. For example, some questions may simply require a “Yes” or “No” response; others may require supporting documentation.

Graduation Rate of School(s) at the 10th, 50th, and 90th Percentiles

Section 4. The graduation rate for the most recent school year of the high school at the 10th percentile, the 50th percentile, and the 90th percentile in the state, ranked in terms of graduation rate. [34 C.F.R. § 200.19(b)(6)(i)(E)]

Indicator	Does state provide sufficient information/adequately answer question? ¹	Comments including concerns, questions, and areas of strength regarding information provided.
A. Provide the name and the graduation rate for the high school at the 10th percentile, the 50th percentile, and the 90th percentile in the state, ranked in terms of graduation rate.	Yes	

Peer Review Summary

Section	Sufficient Information Overall	Comments including concerns, questions, and areas of strength regarding information provided.
Graduation Rate(s) to be Used for AYP Determinations Based on Assessments Administered in 2009-10 and Beyond		
1	Y	The state responded to each indicator and provided the necessary supporting evidence. It is noted that 4 years of data are not available from the longitudinal data system until 2011.
2	Y	The state responded to each indicator and provided supporting evidence.

¹If “No,” annotate what is missing in the “Comments” column. Sufficient information may include the following: guidance that the state provides to schools and districts; impact data; memoranda or board minutes; state board determinations/rulings or links to such documents; state law or links to applicable provisions. For example, some questions may simply require a “Yes” or “No” response; others may require supporting documentation.

Section	Sufficient Information Overall	Comments including concerns, questions, and areas of strength regarding information provided.
5	NA	
Goals, Targets, and Graduation Rates of School(s) at 10th, 50th, and 90th Percentiles		
3	Y	State is commended for establishing a rigorous statewide goal and developing targets representing continuous and substantial improvement to reach the goal, supported by a strong rationale.
4	Y	State provided required information.

Overall General Impressions of Submission:

The state's submission appears to have met the requirements.

¹If "No," annotate what is missing in the "Comments" column. Sufficient information may include the following: guidance that the state provides to schools and districts; impact data; memoranda or board minutes; state board determinations/rulings or links to such documents; state law or links to applicable provisions. For example, some questions may simply require a "Yes" or "No" response; others may require supporting documentation.

--

¹If "No," annotate what is missing in the "Comments" column. Sufficient information may include the following: guidance that the state provides to schools and districts; impact data; memoranda or board minutes; state board determinations/rulings or links to such documents; state law or links to applicable provisions. For example, some questions may simply require a "Yes" or "No" response; others may require supporting documentation.