



Nancy S. Grasmick
State Superintendent of Schools

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June 30, 2011

Ms. Patricia A. McKee
Acting Director
Student Achievement and School Accountability Programs
United States Department of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Dear Ms. McKee:

Thank you for the opportunity to once again submit revisions to our Maryland Accountability Workbook. In accordance with the request in your February 2011 letter to us and subsequent conversations with Valeria Ford, we have made the following changes to our plan:

- Deleted references to Maryland's plan for calculating a graduation rate for 2012,
- Deleted calculation of a dropout rate and its use as the other academic indicator for those few schools that administer only the Alt-MSA (these schools will use graduation rate as the other academic indicator), and
- Set one single graduation rate goal for all schools.

We continue to include the following request and revisions in our plan as contained in our letter to you dated February 11, 2011:

- a request for continued approval of AP/IB assessments in lieu of certain Maryland High School Assessments for Adequate Yearly Progress (AYP) accountability,
- updating our plan to reflect changes in racial codes as required by federal law, and
- minor change in converting and attributing "basic" scores to the school, LEA and/or state for calculating AYP if the state exceeds threshold of proficient or advanced performers on the alternative assessment to accurately reflect our current practice.

Details of our requests follow along with an updated copy of the Maryland Accountability Workbook Plan and Attachment A: Implementation Procedures for AYP Determinations.

Graduation Rate Calculation

Maryland has implemented a longitudinal data system and is able to produce a cohort graduation rate for 2011 for the State, school systems, and schools. Previously Maryland had used the National Center for Education Statistics (NCES) synthetic graduation rate formula and will continue to calculate and report the NCES rate for historical comparison purposes.

AYP Calculation Beginning in 2011

For AYP calculation, beginning with 2011, Maryland will use the cohort graduation rate and a minimum group size of 30 students (N of 30) for determining graduation rate for the all students group for 2011 and for both the all students group and disaggregated subgroups in 2012. The four-year cohort graduation rate will reflect the number of cohort members who earned a regular high school diploma including those who received a diploma in the summer after their fourth year. The graduation rate includes all students in the denominator but only students who earn the Maryland High School Diploma (not GED or certificates) in the numerator. The aggregate graduation rate goal for all schools was set at 95%.

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The standard for the aggregate graduation rate goal for all schools of 95% and the standard for the aggregate graduation rate target for 2011 were set in late February of 2011 using graduation rate data from 2009 and a process involving key stakeholders, followed by the recommendation of the State Superintendent of Schools to the Maryland State Board of Education. Standards and supporting documentation for the 2011 rate were submitted to USDE for review in April 2011 following approval by the State Board of Education in March 2011.

Standards setting in late February determined the annual targets to be used in the 2011 AYP determinations:

- 2010 four-year cohort rate for students entering grade 9 for the first time in 2006-07 and graduating in 2010. (The 2011 AYP determinations were based on the lagged 2010 four-year cohort graduation rate.);
- the five-year cohort rate for the students who entered grade 9 in 2006-07 and graduated in 2011. (By definition, the 2011 five-year cohort graduation rate essentially tracks the non-graduates from the 2009-2010 senior year—fourth year of the cohort—an additional year.).

Standards setting also included discussions of the 2020 goal for graduation rate:

- the 2019 four-year cohort graduation rate target. (Because the lagged four-year graduation rates will be used for AYP in 2020, the 2019 four-year rate will be used in 2020 AYP determinations.)
- the 2020 five-year cohort graduation rate target. (By definition, the 2020 five-year cohort graduation rate will essentially track the non-graduates from the 2018-2019 senior year—fourth year of the cohort—an additional year.).

The 2014 cohort graduation rate targets for AYP purposes will not be independently set. Rather, they will be calculated from the trajectory traced between the 2011 baseline year and 2020. Following the stepwise increases in graduation rate used in the original Maryland Accountability Plan, the 2011 targets would remain in effect for 2012 and 2013. However, 2011 is a transition year as Maryland prepares for a subsequent standard setting in late fall 2011 in preparation for the implementation of the use of graduation rates at the subgroup level for AYP purposes.

For 2011, the graduation requirement can be met by applying a three-step process as follows:

1. Does the school meet the 2010 AMO for the four-year cohort graduation rate?
If no, then proceed to the following question.
2. Does the school meet the 2011 AMO for the five-year cohort graduation rate?
If no, then proceed to the following question.
3. Does the school meet the 2011 four-year cohort graduation rate growth target?
One-year growth is determined by a calculation method comparing cohort results of 2009 with results of 2010. This method was used for 2010 AYP determinations to produce growth rate targets based on the leaver rate.

If one of the three questions produces a positive result for the all students group, then it will be determined that the entity has met the 2011 graduation rate target.

Additional detailed information about graduation rate determinations for 2011 are contained in Maryland's Accountability Workbook Plan and the Plan's Attachment A: Implementation Procedures for Making AYP Determinations for No Child Left Behind.

Advanced Placement/International Baccalaureate Option

In August 2007, the U.S. Department of Education (USDE) granted Maryland flexibility under section 9401 of the ESEA to count a student as proficient in reading/language arts or mathematics when determining AYP if the student achieved the USDE-approved scores on specific AP or IB assessments in place of Maryland's High School Assessments in English and algebra/data analysis. Subsequently, in January 2009, USDE also granted Maryland this flexibility in science for USDE-approved scores on the biology AP or IB exam. USDE approval for English/language arts and mathematics expired with the 2009-10 school year; approval for biology expires at the end of the 2010-11 school year.

Maryland is requesting USDE approval to continue offering the AP/IB option for English/language arts, algebra/data analysis and biology to high school students who meet the previously approved criteria.

Revised Race/Ethnicity Codes

Maryland updated race/ethnicity codes for reporting and for calculating AYP in accordance with federal law. Maryland's Accountability Plan now reflects seven race/ethnicity subgroups which include Hispanic/Latino, American Indian or Alaskan Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, White, and Two or more races. Maryland continues to include three special services subgroups: Free and Reduced Priced Meals (FARMS), Special Education, and Limited English Proficiency (LEP).


Converting and Attributing "Basic" Scores If the State Exceeds the Threshold on Alternative Assessment

Federal law requires that states cap the percent of students in the assessed grade or grades receiving proficient or advanced scores at 1% on the Alt-MSA and 2% on the Mod-MSA/Mod-HSA. To provide additional clarification to the process used by Maryland for converting and attributing "Basic" scores to the school, LEA and/or the state for calculating AYP if the state exceeds the threshold of proficient or advanced performers on the alternative assessment beginning with the 2010-11 school year, Maryland will use a process for redistributing non-proficient scores to determine which student scores will be converted to "basic" and attributed back to the school, LEA and/or the state for the purpose of calculating AYP. The methodology of assigning basic scores to students exceeding the cap is based on the Statewide Student Identifier, a 10-digit number assigned randomly to each student entering Maryland schools. Schools that exceed the 1% and 2% caps will be subject to audit as appropriate.

Maryland is committed to ensuring that the state's plan strongly supports school improvement and provides for the educational growth of every child. We believe these modifications to our plan will help strengthen this commitment and provide a fair and accurate means to identify schools and school systems not making progress. We have incorporated the revisions into our Accountability Workbook Plan and into Attachment A: Implementation Procedures for Making AYP Determinations. The following table provides the references to the specific section of our plan and includes a summary of both the previous and the new state response.

If you have questions concerning this submission, please contact me or call Mary Gable,
Assistant State Superintendent for Academic Policy, at 410-767-0473.

Sincerely,


Nancy S. Grasmick
State Superintendent of Schools

NSG:sks

c: V. Ford

Attachment

Attachment

CHANGES TO THE MARYLAND ACCOUNTABILITY WORKBOOK PLAN

June 30, 2011

Graduation Rate

Question	Summary of Previous State Response	Summary of New State Response
<p>5.5 What is the State’s definition of the minimum number of students in a subgroup required for reporting purposes? For accountability purposes?</p>	<p>Maryland will use a minimum subgroup size of 5 and use statistical significance tests to ensure that AYP determinations are fair and accurate for subgroups of varying sizes.</p>	<p>Added the following: “For graduation rate, Maryland uses an N of 30 for accountability for the all students group and will use an N of 30 for disaggregated subgroups.</p>
<p>7.1 What is the State’s definition for the public high school graduation rate?</p>	<p>Maryland will use the National Center for Education Statistics synthetic graduation rate formula....Maryland will use an N of 30 for determining the graduation rate for the all students group for 2010.</p>	<p>Added the following: In 2011, Maryland will use a cohort graduation rate for AYP calculations for the all students group only for the State, school systems, and schools. Standards for the aggregate graduation rate goal of 95% for all schools and the standards for the aggregate graduation rate target for 2011 were set in late winter of 2011 using graduation rate data from 2009 (cohort of students entering grade 9 for the first time in 2005-06) by key stakeholders, followed by the recommendation of the State Superintendent of Schools to the Maryland State Board of Education. Maryland will use an N of 30 for determining graduation rate for the all students group for 2011. The 2011 AMO for the cohort graduation rate will be used for one year only and will apply to the all students group only. Definitions and calculation formulas have been included in the plan.</p>

<p>7.3 Are the State's academic indicators valid and reliable?</p>	<p>For graduation rate calculation, Maryland will measure on-time graduation, using the NGA formula...</p>	<p>For 2011, the graduation requirement can be met by one of three methodologies: (see Accountability Plan for specifics).</p> <p>For graduation rate calculation, Maryland will measure on-time graduation beginning in 2011 when a statewide longitudinal data system is fully implemented to provide a four-year graduation rate.</p>
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Advanced Placement/International Baccalaureate Option for Students

Question	Summary of Previous State Response	Summary of New State Response
<p>1.3 Does the State have, at a minimum, a definition of basic, proficient and advanced student achievement levels in reading/language arts and mathematics?</p>	<p>Maryland assigns a proficient score to students who score a 3, 4, or 5 on an Advanced Placement exam or a 5, 6, or 7 on an International Baccalaureate exam. In 2008, Maryland began administering a science assessment in grades three and five and using the Maryland HSA in biology as the NCLB-required science test at the high school level.</p>	<p>No change in response. Maryland received approval to use AP/IB exams for English/language arts and mathematics through the 2009-10 school year and to use AP/IB exams for biology through the 2010-11 school year. Maryland is seeking approval to continue this option for students.</p>

Update to Racial/Ethnicity Codes Required by Federal Law

Question	Summary of Previous State Response	Summary of New State Response
<p>5.1 How does the definition of adequate yearly progress include all the required student subgroups?</p> <p>6.1 How is the State's definition of adequate yearly progress based primarily on academic assessments?</p>	<p>All schools have the potential of 19 data elements for AYP as summarized below. Schools and systems are required to test all students within subgroups. Data elements reported for the following: All Students, American Indian, Asian, African American, White, Hispanic, FARMS, Special Education, LEP.</p>	<p>All schools have the potential of 23 data elements....Data elements reported for the following: All Students, Hispanic/Latino, American Indian or Alaskan Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, White, Two or more races, FARMS, Special Education, LEP.</p>

Converting and Attributing “Basic” Scores If Threshold Is Exceeded on Alternative Assessment

Question	Summary of Previous State Response	Summary of New State Response
<p>5.3 How are students with disabilities included in the State’s definition of adequate yearly progress?</p>	<p>If the LEA or State exceeds the 1% threshold of proficient or advanced performers on the alternative assessment, then a procedure will be applied to randomly determine which student scores will be converted to “basic” and attributed back to the school, LEA and/or the State for purposes of calculating AYP.</p> <p>If the LEA or State exceeds the 2% threshold of...then a procedure will be applied to randomly determine which student scores....</p>	<p>If the LEA...then a process for redistributing non-proficient scores will be applied....</p> <p>If the LEA...then process for redistributing non-proficient scores will be applied....</p>