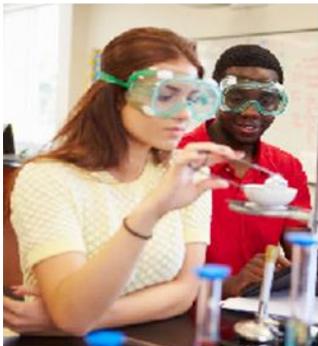


Maryland Consolidated Perkins and Methods of Administration (MOA) Monitoring Program Technical Assistance Manual



Career and Technical Education, Education that Works.



Maryland State Department of Education
Division of Career and College Readiness
Revised and Effective March 2021

[Maryland Public Schools](http://www.marylandpublicschools.org)

Found at URL: www.marylandpublicschools.org

Maryland State Department of Education

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

Clarence C Crawford.
President, Maryland State Board of Education

Larry Hogan
Governor

A full list of Maryland State Board of Education Members can be found on the [Maryland State Department of Education's website](#).

Division of Career and College Readiness

Tiara Booker-Dwyer
Assistant State Superintendent

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

Marquita Friday
Director of Career Programs

Nina Roa
Director of Finance and Legislation for Career Programs

A full Division staff list is in [Appendix B](#).

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

Equity Assurance and Compliance Office
Office of the Deputy State Superintendent for Finance and Administration
Maryland State Department of Education
200 West Baltimore Street, Baltimore, MD 21201-2595
410-767-0426 - Voice, 410-767-0431 – Fax, 410-333-6442 - TTY/TDD

Copyright © 2021 MSDE All Rights Reserved

Table of Contents

Document Control	5
Document Information	5
Document History.....	5
Introduction	5
Purpose of Document.....	5
What is the Maryland Consolidated Perkins & MOA Monitoring Program?	5
Why does the Maryland State Department of Education Conduct Consolidated Perkins & MOA Monitoring Reviews?.....	7
Plan for Performing Oversight Responsibilities	8
Recipient Universe	8
Processes and Procedures to Conduct Compliance Reviews	11
Selection Plan	12
<i>Selection Criteria</i>	<i>12</i>
Compliance Review Notification	16
Consolidated Perkins and MOA Compliance Review Criteria	16
<i>Compliance Criteria for Local School Systems and Community Colleges</i>	<i>17</i>
<i>Compliance Criteria for Juvenile Services Education and Adult Correctional Education</i>	<i>18</i>
The Compliance Review	19
Timeline for Perkins and MOA Process and Procedures	20
Steps in the Consolidated Perkins & MOA Monitoring Review Process	21
How to Prepare for the Consolidated Perkins & MOA Monitoring Review	23
Technical Assistance	24
Appendix A: Personnel Responsible for Leading and Facilitating Perkins and MOA Compliance Reviews	26
Appendix B: Division Team Members	27
Appendix C: Glossary	28
APPENDIX D: Sample Agenda for On-Site Visit	32
APPENDIX E: Sample Interview Questions	33
APPENDIX F: Notice of Non-Discrimination (Sample)	36
APPENDIX G: Frequently Asked Questions	37
APPENDIX H: Compliance Plan Template	40

APPENDIX I: Student Interview Participants Demographic Information41
APPENDIX J: Civil Rights Compliance Helpful Links42
APPENDIX K: Facilities Accessibility Checklist43

Document Control

Document Information

Title:	Maryland Consolidated Monitoring Technical Assistance Manual
Security Level:	Unclassified – For Official Use Only
Filename:	Consolidated Monitoring Technical Assistance Manual.pdf

Document History

The table below notes all updates and revisions to this document and any revisions to Maryland’s Consolidated Perkins & Methods of Administration (MOA) Monitoring Plan policies and procedures for implementation or monitoring.

Document Version	Date	Summary of Change
DRAFT	September 2020	Creation
1.0	March 2021	Document finalized and published.

Introduction

Purpose of Document

The purpose of this document is to provide a comprehensive overview of the Consolidated Perkins and Methods of Administration (MOA) Monitoring Program to recipients of federal education funds from school systems, community colleges, and state-operated programs that have Career and Technical Education (CTE) programs of study. The information outlined allows for greater understanding of the program process and preparation for virtual and on-site monitoring reviews.

What is the Maryland Consolidated Perkins & MOA Monitoring Program?

The Maryland Consolidated Perkins and Methods of Administration (MOA) Monitoring Program is a comprehensive evaluation-compliance-monitoring process under which each recipient’s system of CTE is evaluated and progress is monitored to ensure their compliance in the equity and access of high-quality CTE for all. The Consolidated Monitoring Program combines Perkins V and the MOA compliance requirements to expand opportunities for students to explore, choose, and pursue CTE programs of study and career pathways in an equitable, non-discriminatory manner. It also increases access and equity in CTE for students based on race, color, national origin, and disability, including the expanded list of special populations under Perkins V. Maryland’s Consolidated Monitoring Program provides a holistic approach for education agencies to monitor compliance under MOA and Perkins V requirements, review implementation, assess outputs, and measure effectiveness of CTE statewide. The Maryland State

Department of Education (MSDE) is the lead agency responsible for administration of both Perkins V and MOA requirements across the state of Maryland.

The [Maryland Consolidated Perkins and MOA Monitoring plan](#) describes how the MSDE will implement federal Perkins V and MOA requirements to support equitable student access and program performance in CTE programs of study. It outlines the selection process for how education agencies are identified for compliance reviews, the criteria used to determine their compliance with state and federal requirements, and the on-going monitoring to ensure progress and completion of corrective actions needed based on findings during compliance reviews. The Maryland Consolidated Perkins and MOA Monitoring Plan is purposefully aligned to the [Methods of Administration \(MOA\) Plan](#), which was approved by the United States Department of Education in October 2020 and the [Maryland CTE Four-Year State Plan](#) approved by the United States Department of Education in May 2020, to ensure a consistent approach to CTE statewide.

Perkins V, also known as the [Strengthening Career and Technical Education for the 21st Century Act](#), expands opportunities for students to explore, choose, and pursue CTE programs of study and career pathways to earn credentials of value. Additionally, it provides states and local education agencies with a critical framework to center equity within Career and Technical Education Comprehensive Local Needs Assessment (CLNA). The MOA program was developed by the United States Department of Education (USDE) and Office for Civil Rights (OCR), to ensure that all students, regardless of race, color, national origin, sex, or disability, have equal access to high-quality CTE programs through the compliance of the following federal civil rights laws: (1) [The Civil Rights Act of 1964, Title VI](#), (2) [The Rehabilitation Act of 1973, Section 504](#), (3) [The Education Amendments of 1972, Title IX](#), and (4) [The American With Disabilities Education Act Of 1990, Title II](#).

Traditionally, MOA and Perkins data evaluations, compliance reviews, and progress monitoring were completed in isolation of each other. Beginning in the 2020-2021 school year, MOA and Perkins compliance reviews will be consolidated to one comprehensive review process for CTE. This Consolidated Plan supports a holistic approach to monitor compliance with MOA and Perkins V requirements, review implementation, assess outputs, and measure effectiveness of CTE statewide. Outcomes from data evaluations and compliance reviews will be used to inform technical assistance, professional learning experiences, and resources provided by the state to recipients to support implementation of practices that support equity in CTE programs statewide.

CTE programs of study are implemented in 24 local school systems, 15 community colleges, and 22 state-operated programs (i.e., Juvenile Services Education and Adult Correctional Education). Each entity that implements a CTE program of study and receives federal funds (referred to as “recipients” throughout this document) is required to adhere to MOA and Perkins V requirements. The Division of Career and College Readiness (DCCR) at the MSDE is responsible for facilitating the evaluation, compliance, and progress monitoring process to ensure that all recipients adhere to federal requirements established by MOA and Perkins V.

Why does the Maryland State Department of Education Conduct Consolidated Perkins & MOA Monitoring Reviews?

On July 31, 2018, the Strengthening Career and Technical Education for the 21st Century Act (Perkins V), which reauthorized and amended the Carl D. Perkins Career and Technical Education Act of 2006 was established. The U. S. Department of Education’s Office of Career, Technical, and Adult Education (OCTAE) developed this guide to assist each eligible agency in preparing and submitting annual reports to the Department under the reauthorized Perkins Act and applicable Federal regulations. Additionally, through its Methods of Administration authority, the U.S. Department of Education’s Office of Civil Rights (OCR) oversees the civil rights compliance programs of state agencies that administer career and technical education. As the responsible agency for each of these programs, the Maryland State Department of Education (MSDE) is accountable for the administration of all responsibilities under the Perkins and MOA program. The Division of Career and College Readiness (DCCR) is tasked with coordinating administration and ensure all responsibilities are met. To enable eligible recipients to efficiently and effectively meet their annual reporting requirements, MSDE has combined these reports into a single reporting instrument called the Maryland Consolidated Perkins & MOA Monitoring Plan.

These responsibilities include narrative performance reports, financial reports, and performance data reports pursuant to the Perkins Act, conducting targeted compliance reviews of selected secondary and postsecondary schools, and state-operated programs that provide career and technical education; securing corrective action when Perkins and/or civil rights violations are found; and periodically reporting Perkins and civil rights activities and findings to OCR. Partnership and collaboration between DCCR and all recipients (i.e., local school systems, community colleges, and state-operated programs) are important underpinnings of the Maryland Consolidated Perkins and MOA Monitoring Plan.

Plan for Performing Oversight Responsibilities

The Maryland Consolidated Perkins and MOA Monitoring Plan for Performing Oversight Responsibilities identifies Maryland's evaluation, compliance, and progress monitoring process to prevent, identify, and remedy gaps in CTE student access and progress among student groups as well as to customize support in maintaining high-quality CTE programs of study. It outlines the plan to evaluate civil rights data, Perkins V data, and related requirements; conduct periodic compliance reviews both in-person and virtually; notify recipients of non-compliance findings to remedy and monitor progress in addressing corrective actions.

Recipient Universe

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

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

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

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

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

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

	Local School Systems	MOA Review Years	Perkins Review Years
1	Allegany County	1991	2017
2	Anne Arundel County, North	1991, 2000, 2009	2018
3	Anne Arundel County, South	1991, 2000	2018
4	Baltimore City, North East	1991, 2019	2015
5	Baltimore City, North West	1991, 2015	2015
6	Baltimore City, South East	1991	2015
7	Baltimore City, South West	1991	2015
8	Baltimore County, Central	1995	2016
9	Baltimore County, North East	1995	2016
10	Baltimore County, North West	1995	2016
11	Baltimore County, South East	1995, 2004	2016
12	Baltimore County, South West	1995	2016
13	Calvert County	1995, 2012	2018
14	Caroline County	1996, 2015	2014
15	Carroll County	1992, 2011	2018
16	Cecil County	1993	2019
17	Charles County	1990, 1999, 2018	2017
18	Dorchester County	1991, 2008	2014
19	Frederick County	1990, 2008	2016
20	Garrett County	1993	2015
21	Harford County	1992, 2004	2019
22	Howard County	1995, 2016	2017
23	Kent County	1998, 2005	2014
24	Montgomery County, Cluster 1	1993, 2006	2015
25	Montgomery County, Cluster 2	1993	2015
26	Montgomery County, Cluster 3	1993, 2011	2015
27	Montgomery County, Cluster 4	1993	2015
28	Montgomery County, Cluster 5	1993	2015
29	Montgomery County, Cluster 6	1993	2015
30	Prince George's County, Region I	1992	2015
31	Prince George's County, Region II	1992, 2014	2015
32	Prince George's County, Region III	1992	2015
33	Prince George's County, Region IV	1992	2015
34	Prince George's County, Region V	1992, 2016	2015
35	Queen Anne's County	1993, 2018	2016
36	St. Mary's County	1996	2017
37	Somerset County	1990, 2009	2015
38	Talbot County	1990, 2017	2015
39	Washington County	1989, 2009	2018
40	Wicomico County	1993, 2013	2017
41	Worcester County	1997, 2013	2017

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

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

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

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

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

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

Processes and Procedures to Conduct Compliance Reviews

Compliance reviews will be facilitated on-site or virtually by a team led by the Division of Career and College Readiness. [Appendix B](#) identifies team leads for compliance reviews. The team aims to conduct a total of ten compliance reviews per year. The bulleted list identifies the projected number of reviews that will occur per year for secondary, postsecondary, and state-operated institutions which **include a minimum of 2 Secondary reviews and 1 Postsecondary review.**

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

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

Selection Plan

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

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

Selection Criteria

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

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

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

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

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

ACCESS	I	CTE Disproportionate Gender Enrollment	
		Enrollment percentage of students based on gender compared to recipient's enrollment percentage (+/-20% or greater).	+2 points assigned to each cluster that is unrepresentative by gender.
	II	CTE Disproportionate Disability Enrollment	
		Enrollment percentage of students with disabilities in CTE programs compared to the recipient's enrollment percentage of students with disabilities (+/-5% or greater).	+2 points assigned to each cluster having an unrepresentative number of students with disabilities in CTE clusters.
	III	CTE Disproportionate Minority Enrollment	
		Enrollment percentage of students with minority status* in CTE programs compared to recipient's enrollment percentage of students with minority status (+/-10% or greater).	+2 points assigned to each cluster having an unrepresentative number of minority students in CTE clusters.
	IV	CTE Disproportionate Economically Disadvantaged Enrollment	
		Enrollment percentage of Economically Disadvantaged (ED) students compared to recipient's enrollment percentage of ED students (+/-10% or greater).	+2 points assigned to each cluster having an unrepresentative number of ED students in CTE clusters.
	V	CTE Disproportionate English Language Learner Enrollment	
		Enrollment percentage of English Learner (EL) students compared to recipient's enrollment percentage of EL students (+/-5% or greater).	+2 points assigned to each cluster having an unrepresentative number of EL students in CTE clusters.

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

EQUITY	VI	CTE Disproportionate Performance for Gender	
		For each cluster, gender student group not meeting target for each performance indicator once target was made.	+1 point assigned for each cluster where gender student group did not meet performance target for each performance indicator. (Non-traditional concentrator enrollment indicator excluded)
	VII	CTE Disproportionate Performance for Race	
		For each cluster, racial student group not meeting target for each performance indicator once target was made.	+1 point assigned for each cluster where racial student group did not meet performance target for each performance indicator.
	VIII	CTE Disproportionate Performance for Economically Disadvantaged	
		For each cluster, economically disadvantaged student group not meeting performance target for each performance indicator once target was made.	+1 point assigned for each cluster where economically disadvantaged student group did not meet performance target for each performance indicator.
	IX	CTE Disproportionate Performance for Students with Disabilities	
		For each cluster, students with disabilities (SWD) not meeting target for each performance indicator once target was made.	+1 point assigned for each cluster where SWD group did not meet performance target for each performance indicator.
	X	CTE Disproportionate Performance for English Learner Students	
		For each cluster, English Learner students not meeting for each performance indicator once target was made.	+1 point assigned for each cluster where English Learner students did not meet performance target for each performance indicator.

QUALITY	XI	CTE Program Performance	
		For each program of study, students not meeting target (within 90%).	+1 point assigned for each program of study for every year target is not met in three-year span for each performance indicator.
	XII	Time Since Last Review	
	The number of years since the recipient's last on-site civil rights review	+1 Index Point (for every year) Recipient history is calculated directly into the Index Score	

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

Ranking Process

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

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

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

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

Exceptions: (1) In a case where more than two regions of a single local school system are listed with the most points, only one of the regions in that local school system will be chosen and the next highest ranking recipient from a differing local school system will be chosen.

(2) In the event a recipient cannot be visited due to some unforeseen circumstance, then the next ranked recipient will be selected.

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

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

Exceptions: (1) In a case where the community college selected maintains more than one campus site listed as a recipient, the recipient (campus site) with the longest time since last review will be selected over the recipient (campus site) with the more recent review date.

(2) In the event a recipient cannot be visited due to some unforeseen circumstance, the next ranking recipient will be selected.

State Operated Programs: State operated programs will not be ranked. Instead, two adult facilities or juvenile facilities will be randomly selected for review during the two-year reporting cycle.

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

Compliance Review Notification

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

Consolidated Perkins and MOA Compliance Review Criteria

Compliance review criteria are based on Perkins and MOA legislative requirements. These criteria provide alignment with school systems, community colleges, juvenile services education, and adult correctional education current required program protocols, evaluation and reporting requirements. There are 29 review criteria which span seven compliance review categories for local school systems and community colleges. State-operated programs are offered in adult correctional facilities and juvenile residential facilities where all state-operated programs are open-entry/open-exit with participation based on those meeting institutional criteria. As a result of the unique way in which state-operated CTE programs are offered, the monitoring process has been modified to reflect the review criteria most applicable to the programs and services provided. As such, there are 18 review criteria which span seven compliance review categories for juvenile services education and adult correctional education.

Recipients will be required to compile, at minimum, specific documented items and submit electronically to the Division of Career and College Readiness. The seven Perkins and MOA specific monitoring compliance review categories are outlined on the following pages. Additional information on compliance review criteria categories, including detailed descriptions of each criterion and the evidence required, can be found in the [Consolidated Perkins and MOA Compliance Review Criteria Document for Local Schools Systems and Community Colleges](#) and [Consolidated Perkins and MOA Compliance Review Criteria Document for Juvenile Services Education and Adult Correctional Education](#) located on our website. Additionally, since this Consolidated Plan supports a holistic approach to monitor compliance with MOA and Perkins V requirements, some of the evidence listed within the compliance review criteria can be used to fulfill more than one criteria. Where applicable, this indication is noted in the required evidence section of all pertinent criteria on each of the Perkins and MOA Compliance Plan Review Criteria Documents. Please note, CCTEP stands for Consolidated Career and Technical Education Plan.

Compliance Criteria for Local School Systems and Community Colleges

Assessment of Equity and Student Access- Compliance Review Criteria Category #1

CCTEP1A – Perkins: Needs Assessment Evaluation of Access, Equity and Student Performance Criteria
CCTEP1B – MOA: Recruitment Criteria
CCTEP1C – MOA: Admissions Criteria
CCTEP1D – MOA: Counseling Criteria
CCTEP1E – MOA: Administrative Criteria

Assessment of Student Progress - Compliance Review Criteria Category #2

CCTEP2A – Perkins: Needs Assessment Scope Criteria
CCTEP2B – Perkins: Needs Assessment Evaluation of Access, Equity, and Student Performance Criteria
CCTEP2C – Perkins: Needs Assessment Evaluation of Progress towards Program Implementation Criteria
CCTEP2D – MOA: Services for Students with Disabilities Criteria

Assessment of CTE Alignment with Local Workforce Needs - Compliance Review Criteria Category #3

CCTEP3A – Perkins: Needs Assessment Alignment of Workforce and/or Economic Needs Criteria
CCTEP3B – Perkins: Needs Assessment Quality Criteria
CCTEP3C – MOA: Work-Based Learning Criteria

Curriculum and Instruction - Compliance Review Criteria Category #4

CCTEP4A – Perkins: Needs Assessment Size Criteria
CCTEP4B – Perkins: Needs Assessment Scope Criteria
CCTEP4C – Perkins: Needs Assessment Quality Criteria

CTE Capacity, Resources, and Instructional Facilities - Compliance Review Criteria Category #5

CCTEP5A – MOA: Site Location and Facilities Selection Criteria
CCTEP5B – MOA: Housing in Postsecondary Institutions (Postsecondary ONLY)
CCTEP5C – Perkins: Needs Assessment Scope Criteria
CCTEP5D – Perkins: Needs Assessment Quality Criteria
CCTEP5E – MOA: Employment of Faculty and Staff Criteria
CCTEP5F – MOA: Accessibility of Facilities Criteria
CCTEP5G – MOA: Comparable Facilities Criteria
CCTEP5H – MOA: Financial Assistance Criteria

Program Plan and Evaluation - Compliance Review Criteria Category #6

CCTEP6A – Perkins: Needs Assessment Evaluation of Progress Towards Program Implementation Criteria
CCTEP6B – Perkins: Needs Assessment Scope Criteria
CCTEP6C – Perkins: Expert Review Team Criteria

Reporting and Record Keeping - Compliance Review Criteria Category #7

CCTEP7A – Perkins: Data Reporting and Record Keeping Criteria
CCTEP7B – Perkins: Grant and Program Reporting and Record Keeping Criteria
CCTEP7C – Perkins: Financial Reporting and Record Keeping Criteria

Compliance Criteria for Juvenile Services Education and Adult Correctional Education

Assessment of Equity and Student Access- Compliance Review Criteria Category #1

CCTEP1B – MOA: Recruitment Criteria
CCTEP1C – MOA: Admissions Criteria
CCTEP1D – MOA: Counseling Criteria
CCTEP1E – MOA: Administrative Criteria

Assessment of Student Progress - Compliance Review Criteria Category #2

CCTEP2D – MOA: Services for Students with Disabilities Criteria

Assessment of CTE Alignment with Local Workforce Needs - Compliance Review Criteria Category #3

CCTEP3A – Perkins: Needs Assessment Alignment of Workforce and/or Economic Needs Criteria
CCTEP3C MOA: Work-Based Learning Criteria

Curriculum and Instruction - Compliance Review Criteria Category #4

CCTEP4B – Perkins: Needs Assessment Scope Criteria

CTE Capacity, Resources, and Instructional Facilities - Compliance Review Criteria Category #5

CCTEP5A – MOA: Site Location and Facilities Selection Criteria
CCTEP5C – Perkins: Needs Assessment Scope Criteria
CCTEP5D – Perkins: Needs Assessment Quality Criteria
CCTEP5E – MOA: Employment of Faculty and Staff Criteria
CCTEP5F – MOA: Accessibility of Facilities Criteria
CCTEP5G – MOA: Comparable Facilities Criteria

Program Plan and Evaluation - Compliance Review Criteria Category #6

CCTEP6B – Perkins: Needs Assessment Scope Criteria

Reporting and Record Keeping - Compliance Review Criteria Category #7

CCTEP7A – Perkins: Data Reporting and Record Keeping Criteria
CCTEP7B – Perkins: Grant and Program Reporting and Record Keeping Criteria
CCTEP7C – Perkins: Financial Reporting and Record Keeping Criteria

The Compliance Review

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

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

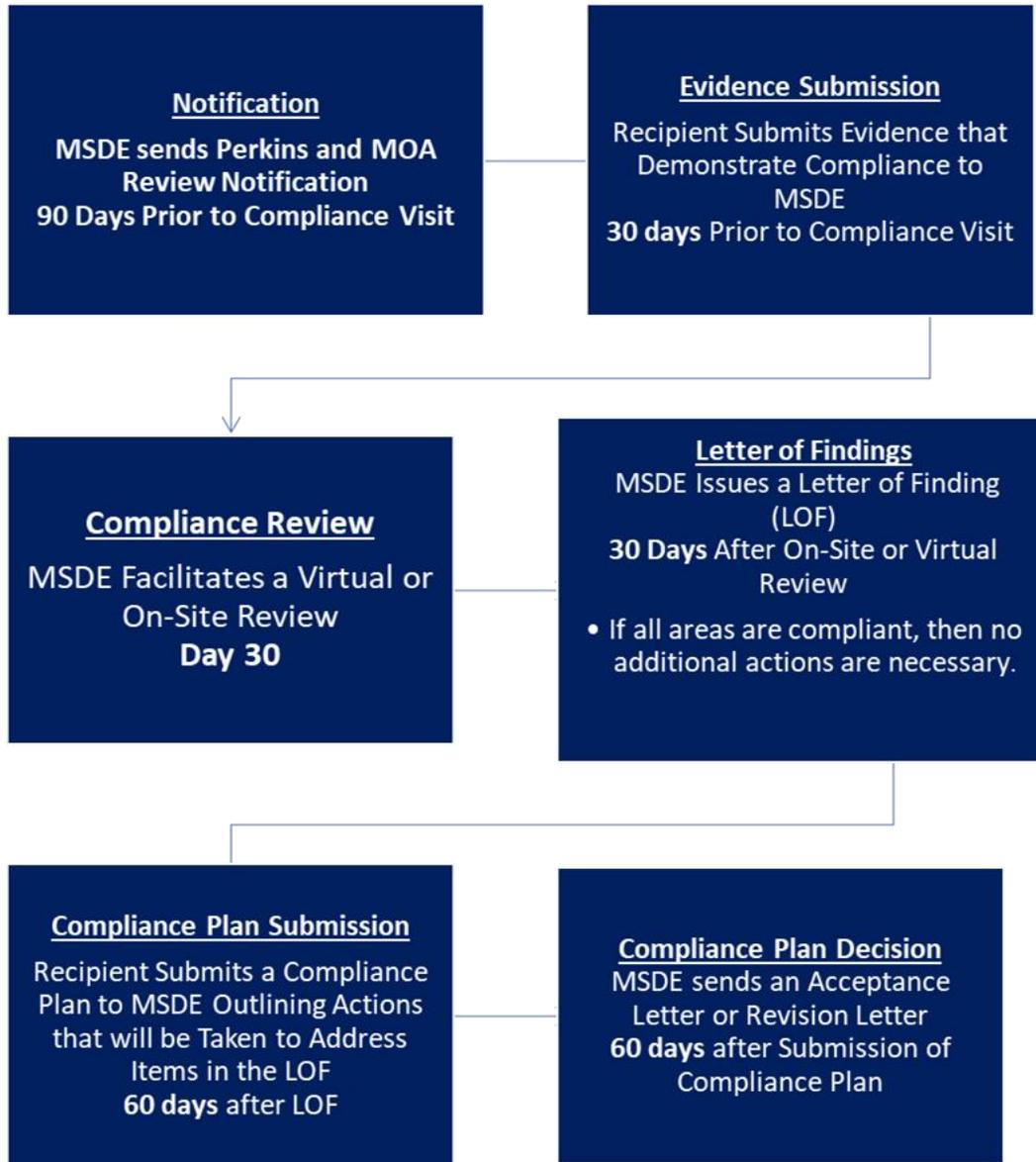
The review team will analyze materials submitted by the recipient. If submitted materials appropriately address the findings in the Letter of Findings then an Acceptance Letter will be issued by the Division of Career and College Readiness to the Superintendent, Chief Executive Office, College President,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

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

Timeline for Perkins and MOA Process and Procedures

[Figure 2](#) provides a summary of the timeline for implementation of processes and procedures for Perkins and MOA Consolidated Compliance Reviews.

Figure 2: Timetable



Steps in the Consolidated Perkins & MOA Monitoring Review Process

- 1. Recipient will receive Consolidated Perkins & MOA Monitoring Review notification letter** from Division of Career and College Readiness (DCCR). The notification letter will be sent to the Superintendent, College President or State-Operated Program Executive Administrator at least 90 days prior to compliance review.
- 2. Recipient will provide the name and contact information of the person(s) of contact (POC)** coordinating the Consolidated Perkins & MOA Monitoring Review to: Dr. China Wilson, Equity & Civil Rights Compliance Specialist, 410-767-0180, china.wilson@maryland.gov
- 3. Recipient's POC(s) will convene a Consolidated Perkins & MOA Monitoring Review Team** which may include: local school system superintendent/community college administration official/state-operated program executive administrator, CTE Director/Coordinator/Administrator, Director of Counseling, Director of Special Education, Case Managers, Title IX Officer, Section 504/Title II Officer, Director of English Learners (EL)/English for Speakers of Other Languages (ESOL) Services, Director of Facilities/Physical Plant, etc. to assist in the coordination of the monitoring review.
- 4. Recipient will collect evidence and documentation for all criteria areas** and organize documents by category and CTEP title for each criteria area listed on either the [Consolidated Perkins and MOA Compliance Review Criteria Document for Local Schools Systems and Community Colleges](#) or [Consolidated Perkins and MOA Compliance Review Criteria Document for Juvenile Services Education and Adult Correctional Education](#).
- 5. Recipient will be required to submit Perkins and MOA Review documentation** to the Division of Career and College Readiness at least 30 days prior to their virtual or on-site review. Documents must be submitted using a document submission link provided by DCCR.
- 6. The DCCR review team will carefully review all of the evidence/documentation submitted** to determine if there are any areas in which the recipient was non-compliant with federal civil rights laws and/or regulations.

The following steps are for [Virtual Reviews](#):

- 7. The recipient's Consolidated Perkins & MOA Monitoring Team will select and manage coordination of applicable virtual interview groups** for the Consolidated Perkins & MOA Monitoring Review:
 - Local School System Central Office Personnel/High School Principals; College Administration and Student Services Personnel.
 - CTE Teachers/CTE College Faculty, School/Case Managers/College Counselors/Counseling Staff
 - CTE Students
 - State-Operated Program Personnel/Partnering Agencies

The following steps are for On-Site Reviews:

8. **Recipient will schedule dates and times** for DCCR's Consolidated Perkins & MOA review team to conduct on-site monitoring interviews and facilities accessibility reviews.
9. **The recipient's Consolidated Perkins & MOA Monitoring Team will select and manage coordination of applicable on-site interview groups** for the Consolidated Perkins & MOA Monitoring Review:
 - Local School System Central Office Personnel/High School Principals; College Administration and Student Services Personnel.
 - CTE Teachers/CTE College Faculty, School/Case Managers/College Counselors/Counseling Staff
 - CTE Students
 - State-Operated Program Personnel/Partnering Agencies
10. **DCCR review team will provide a brief on-site overview of any significant findings** identified during review of the documents provided to DCCR as evidence of Perkins and civil rights compliance and request any additional required documentation.
11. **Recipient will participate in brief exit discussion** at conclusion of monitoring interviews to hear preliminary findings.

Upon completion of Virtual Review or On-Site Review:

12. **Recipient will receive formal written Letter of Findings (LOF)** sent to Superintendent, College President or State-Operated Program Executive Administrator within 30 days of conclusion of virtual or on-site visit.
13. **Recipient will provide a written Consolidated Perkins & MOA Compliance Plan addressing all identified non-compliant corrective actions** within 60 days of receipt of the LOF. (See **APPENDIX**)
14. **Recipient will respond to periodic monitoring requests** providing updates on corrective actions listed in the Consolidated Perkins & MOA Compliance Plan.
15. **Recipient will submit verifiable documentation of final completion** of all required corrective actions once all of the corrective action items in the LOF have been fully addressed and completed.
16. **Recipient will receive closeout letter** from DCCR sent to the Superintendent, College President or State-Operated Program Executive Administrator upon verification of completion of the Consolidated Perkins & MOA Compliance Plan.

How to Prepare for the Consolidated Perkins & MOA Monitoring Review

1. *Provide the name and contact information* of the person(s) of contact (POC) coordinating the Consolidated Perkins & MOA Monitoring Review to: Dr. China Wilson, Equity & Civil Rights Compliance Specialist, 410-767-0180, china.wilson@maryland.gov
2. *Convene a Consolidated Perkins & MOA Monitoring Review Team* which may include: local school system superintendent/community college administration official/state-operated program executive administrator, CTE Director/Coordinator/ Administrator, Director of Counseling, Director of Special Education, Case Managers, Title IX Officer, Section 504/Title II Officer, Director of EL/ESOL Services, Director of Facilities/Physical Plant, etc. to assist the POC(s) with coordination of the monitoring review.
3. ***Identify and assemble documents/evidence for submission*** to the Division of Career and College Readiness (DCCR) at least 30 days prior to virtual or on-site review. Documents must be submitted using a document submission link provided by DCCR and must be organized by category and Consolidated Career and Technical Education Plan (CCTEP) title for each criteria area listed on either the [Consolidated Perkins and MOA Compliance Review Criteria Document for Local Schools Systems and Community Colleges](#) or [Consolidated Perkins and MOA Compliance Review Criteria Document for Juvenile Services Education and Adult Correctional Education](#).
4. *Inform all participating faculty, staff and students about the upcoming monitoring interviews* to be conducted by the Division of Career and College Readiness staff. Recipients are required to schedule individuals to participate in the following interview groups:
 - a. **School System Central Office Personnel/High School Principals /College Administration/State-Operated Program Administrators and Student Services**
This interview group must consist of individuals with knowledge of both system/college/state-operated program policies and procedures, and CTE. Especially important for members of this group is knowledge and expertise of policies and procedures relating to Perkins and civil rights. The CTE Director, Director of Special Education, Coordinator(s) of Section 504/Title II, the Title IX Coordinator, the Director of Student Services, the individual responsible for handling student/employee grievances, the Director of Human Resources, the Director of Facilities, and individual School Principals. The interview group should be limited to no more than 15 individuals.
 - b. **CTE Teachers/CTE College Faculty/School Counselors/Case Managers/Counseling Staff**
This interview group must consist of teachers/faculty who instruct in a representative variety of CTE programs. In addition, this group is to include Counselors/Case Managers and Counseling staff from each school/program. The group should be limited to no more than 15 participants.

- c. **Students** -The student interview group must be comprised of no more than 15 students. Participation from both CTE and non-CTE students is required. CTE students included in this group must be representative of a wide variety of local school system/community college/state-operated CTE programs. The student interview group will need to include CTE and non-CTE students from the following categories:
- Students with Disabilities
 - Students with Minority Status (African-American, Hispanic, Native American, Pacific Islander)
 - Students that are English Learners
 - Students from underrepresented gender groups participating in non-traditional programs (required for CTE students only)
5. Provide the list of staff, faculty and, students scheduled to participate in the virtual/on-site interviews prior to the interview date. At least 14 days prior to the interview, the list of students (Last Name, First Name, Middle Name, SASID, Date of Birth) participating in the student interview group must be submitted to Dr. China Wilson, Equity & Civil Rights Compliance Specialist, 410-767-0180, china.wilson@maryland.gov via the MSDE secure server. Student demographic data (see **APPENDIX**) should be sent to Dr. Wilson via the MSDE Secure Server and uploaded to the school system's/College's/State-Operated Program's designated CTE folder. Please notify Dr. Wilson when the requested student information has been uploaded to the secure server.
6. *For On-Site Reviews Only:*
- **Develop a draft agenda for the on-site visit** and forward a copy to the Division of Career and College Readiness for review and feedback. Please see the sample agenda (**APPENDIX**).
 - **Identify and schedule use of a room** as the on-site review team's meeting room. This room will be used all day for on-site interviews and must be equipped appropriately with tables and chairs, a projector and electrical outlets/internet service.
 - **Schedule accessibility review of facilities** and provide dates and times along with the name and contact information for the Facilities Director/Coordinator to Dr. China Wilson, Equity & Civil Rights Compliance Specialist, 410-767-0180, china.wilson@maryland.gov.

Technical Assistance

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

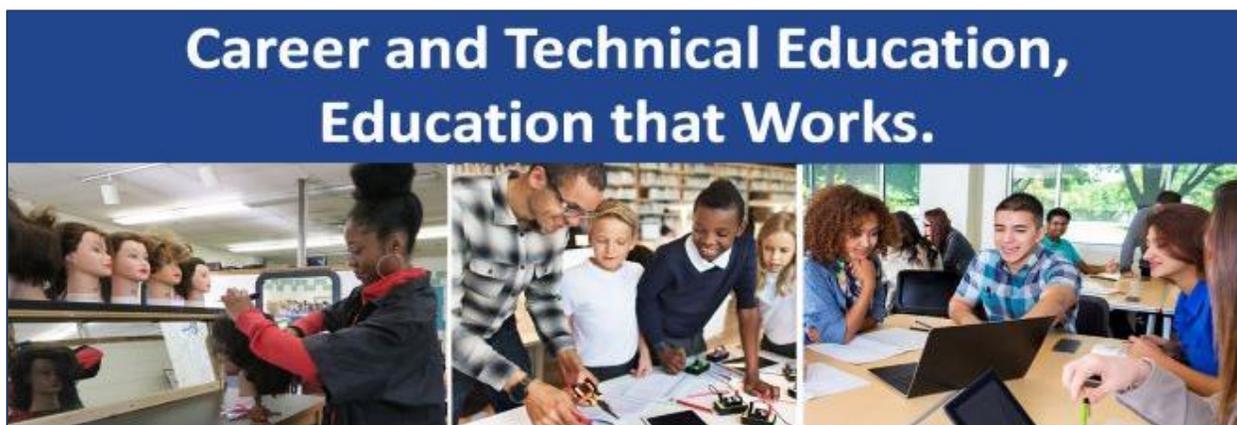
Statewide technical assistance is provided to all recipients. Perkins and MOA [data](#) is used to inform content of statewide technical assistance. Statewide technical assistance is facilitated through webinars, in-person convenings, resource development, and professional learning experiences. Quarterly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

The Division of Career and College Readiness also provides case-specific technical assistance to individual recipients before or after a compliance review. Dr. China Wilson will lead all technical assistance and facilitation of compliance reviews. Refer to [Appendix A](#) for the list of personnel that will support facilitation of compliance reviews in school systems and community colleges.

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

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

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



Appendix A: Personnel Responsible for Leading and Facilitating Perkins and MOA Compliance Reviews

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

Compliance Review Lead Personnel:

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

Dr. China Wilson will lead all technical assistance and facilitation of compliance reviews. [Table 6](#) identifies personnel that will support facilitation of compliance reviews in school systems and community colleges. The facilitation of compliance reviews of state-operated programs will be supported by Dr. Nicassia Belton and Ms. Nina Roa.

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

Pam Clay – Career and Technical Education Associate for the Eastern Shore	
Caroline County Public Schools Chesapeake College Dorchester County Public Schools Kent County Public Schools Queen Anne’s County Public Schools	Somerset County Public Schools Talbot County Public Schools Wicomico County Public Schools Worcester County Public Schools Wor-Wic Community College
Dean Kendall, Career Programs and Grants Specialist	
Allegany County Public Schools Allegany College of Maryland Baltimore City Community College Baltimore City Public Schools Baltimore County Public Schools Carroll Community College Carroll County Public Schools Cecil College Cecil County Public Schools	Community College of Baltimore County Garrett College Garrett County Public Schools Hagerstown Community College Harford Community College Harford County Public Schools Howard Community College Howard County Public Schools Washington County Public Schools
Traci Verzi, Coordinator of Finance and Legislation for Career Programs	
Anne Arundel Community College Anne Arundel County Public Schools Calvert County Public Schools Charles County Public Schools College of Southern Maryland Frederick Community College Frederick County Public Schools	Montgomery College Montgomery County Public Schools Prince George’s Community College Prince George’s County Public Schools St. Mary’s County Public Schools

Appendix B: Division Team Members

Division of Career and College Readiness and Office of Leadership Development and School Improvement

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

Tiara Booker-Dwyer, Assistant State Superintendent

Miranda Hill, Administrator to the Assistant State Superintendent

Nicassia Belton, Ed.D., Director of Data and Accountability for Career Programs & MOA Coordinator

China Wilson, Ph.D., Equity and Civil Rights Compliance Specialist

Katherine Stewart, Ph.D., Acting Coordinator of Data and Accountability for Career Programs

Marquita Friday, Director of Career Programs

Charles (Scott) Nichols, Interim Coordinator Career Programs, STEM, and Computer Science

Charles (Chuck) Wallace, Coordinator of Career Programs and Student Organizations

Vacant, Management Associate

Jennifer Griffin, Career Programs and Apprenticeship Specialist

Elissa Hozore, Computer Science Specialist

Kent Seuferer, Career Programs and Student Organization

Nina Roa, Director of Finance and Legislation for Career Programs

Traci Verzi, Coordinator of Finance and Legislation for Career Programs

Michelle Brownson, Acting Administrative Officer III

Pam Clay, Career and Technical Education Associate for the Eastern Shore

Dean Kendall, Career Programs and Grants Specialist

Office of Leadership Development and School Improvement

Ed Mitzel, Executive Director of Leadership Development and School Improvement

Laura Liccione, Coordinator of Academic Improvement

Morrall Thompson, Coordinator of Systematic Improvement

Anders Alicea, Instructional Transformation Specialist

Tara Corona, Continuous Improvement Specialist

Lori Ellis, Ed.D, Leadership Development Specialist

Vacant, Data Analyst

Felicia Lanham Tarason, Ed.D., School Leadership Support Specialist

Mary Minter, Ed.D., School Leadership Support Specialist

Appendix C: Glossary

All Students

The term “all students” means both male and female students from a broad range of backgrounds and circumstances, including disadvantaged students, students with diverse racial ethnic, or cultural backgrounds, American Indians, Alaska Natives, Native Hawaiians, students with disabilities, students with limited English proficiency, migrant children, school dropouts, and academically-talented students.

Apprenticeship (Registered)

See Work-Based Learning.

Career

The sequence of occupations and other life roles that combine to express one’s commitment to work in a person’s total pattern of self-development. Each person has one lifelong career consisting of several occupations.

Career and Technical Education (or High Quality CTE)

The term ‘career and technical education’ means organized educational activities that offer a sequence of courses that provides individuals with coherent and rigorous content aligned with challenging academic standards and relevant technical knowledge and skills needed to prepare for further education and careers in current or emerging professions. CTE programs provide technical skill proficiency, an industry-recognized credential, a certificate, or an associate degree; and may include prerequisite courses (other than a remedial course). CTE programs include applied learning that contributes to the academic knowledge, higher-order reasoning and problem-solving skills, work attitudes, general employability skills, technical skills, and occupation-specific skills, and knowledge of all aspects of an industry, including entrepreneurship, of an individual.

CTE Participant

The term “CTE participant” means an individual who completes not less than one course in a career and technical education program or program of study of an eligible recipient.

CTE Program Completer

The term “CTE Completer” means a student who meets all requirements outlined in the State approved proposal for a CTE program of study.

CTE Program Concentrator

The term “CTE Concentrator” means at the secondary school level, a student served by an eligible recipient who has completed at least two courses in a single career and technical education program or program of study. At the postsecondary level, it is a student enrolled in eligible recipient who has earned at least 12 credits within a career and technical education program or program of study; or completed such a program if the program encompasses fewer than 12 credits or the equivalent in total.

CTE Program Developers

Anyone who works with the program advisory committee to develop high-quality CTE programs in accordance with the Division of Career and College Readiness prescribed process is a CTE program developer.

Classification of Instructional Programs (CIP)

The Classification of Instructional Programs (CIP) provide a taxonomic scheme that support the accurate titling, categorization, tracking, assessment and reporting of fields of study including career and technical education programs in Maryland. The full list of CIP codes developed by the U.S. Department of Education's National Center for Education Statistics (NCES) are available in electronic format and can be found [here](#).

Cluster Frameworks and Programs

Career and Technical education programs typically provide programs for students to pursue within one of Maryland's ten cluster areas:

1. Arts, Media and Communication
2. Business Management and Finance
3. Consumer Service, Hospitality and Tourism
4. Construction and Development
5. Environmental, Agricultural and Natural Resources
6. Health and Biosciences
7. Human Resource Services
8. Information Technology
9. Manufacturing, Engineering Technical
10. Transportation Technologies

Career cluster

A grouping of occupations and industries based on shared features or "core functions." The cluster framework defines the scope of the industry, including the core business functions that are critical to the competitiveness and growth of the industry in Maryland. Career clusters provide a tool for schools to organize into small learning communities, academies, or magnet schools (through the use of programs).

Career programs

Related programs of study that provide a multi-year sequence of career guidance, coursework, and work-based learning experiences that enable students to make more informed career choices. Programs are derived from the core functions of the cluster and include the major activities of each function.

Career and Technical Education programs of study are derived from the cluster framework and its accompanying pathways. Programs consist of a coherent sequence of secondary and postsecondary courses leading to a high school diploma, postsecondary degree, and/or an industry certification or credential. More information about Maryland's Ten Career Cluster Frameworks can be found [here](#).

Internship

See Work-Based Learning.

Maryland CTE Programs of Study

A Maryland CTE Program of Study is a structured sequence of academic and CTE courses leading to a postsecondary-level credential and employment. It provides students with a planned, sequential program of study that blends academic, technical, and workplace skills to prepare them for careers and further education. The Maryland CTE Programs of Study are based on the proposal development process with involvement by one or more of the cluster teams in the Division of Career and College Readiness. The cluster team leader convenes or endorses a design team consisting of employers as well as secondary and postsecondary educators. Approved CTE Programs of Study demonstrate the levels of accountability, structure, and support to ensure program quality and replication. The approval process is simplified for local CTE directors since the contents of the program are standardized. When local school systems adopt a Maryland CTE Program of Study, all of the program requirements must be adhered to without modification.

Occupation

An occupation is a cluster of jobs with common characteristics and requiring similar skills (e.g., photographer).

Special Populations

The term ‘special populations’ means individuals with disabilities; individuals from economically disadvantaged families, including low-income youth and adults; individuals preparing for non-traditional fields; single parents, including single pregnant women; out-of-workforce individuals; English learners; homeless individuals described in section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a); youth who are in, or have aged out of, the foster care system; and youth with a parent who is a member of the armed forces (as such term is defined in section 101(a)(4) of title 10, United States Code); and is on active duty (such as term is defined in section 101(d)(1) of such title).

Work

Work is a conscious effort aimed at producing goods or services for the benefit of self or others. Work may be paid or unpaid.

Work-Based Learning

Activities at the high school and college levels that involve actual work experience and connect classroom learning to work. This is an all-encompassing term that includes: apprenticeships, cooperative education, and internships.

Supervised work-based learning (WBL) experiences are designed to provide meaningful work experience as an integral part of the regular career and Technical curricula. They require a partnership involving the education system, business and industry, community agencies and organizations, and the family.

Cooperative CTE is a method of education for students who, through written cooperative arrangements between a school and employers, receive instruction, including required rigorous and challenging academic courses and related CTE instruction, by alternating study in school with placement in a related career field. These experiences are organized around a training plan that is cooperatively developed by the school and employer to add value to and extend a student’s career preparation.

This instruction is planned, organized, and coordinated to assure that each component contributes to the student's education and employability. Cooperative education is provided in one of three major formats: capstone, integrated, and diversified. Diversified education has been revised and is a Maryland CTE Program of Study called Career Research and Development.

- Capstone WBL: The on-the-job component of the program is subsequent to the in school, skill development component. Students are placed at training sites that have the potential to extend and refine competencies that are developed in the in-school component.
- Career Research and Development: The major portion of skill development is provided through on-the-job work experience based on a training agreement (signed by the parent, student, employer, and work-based learning coordinator). The in-school component is concurrent with the on-the-job component and is general in nature rather than directly related to the occupation or placement. The program consists of at least two in-school credits and two on-the-job. The occupational placements are targeted employment opportunities for which an in-school career and Technical program does not exist. This option exists when CTE programs are over-enrolled or when a program is unavailable for students.
- Integrated WBL: The on-the-job component of the program is entered after some in-school skill development, and the in-school skill development component is maintained concurrent with on-the-job experience. Students are placed at training sites that have potential to complement the in-school component.
- Internships: Internships are short-term, paid or unpaid experiences that offer students a chance to work under the tutelage of employers and experience on-the-job training in a mentoring relationship. Students work with an employer to learn about a particular industry or career program. Workplace activities may include special projects, a sample of tasks from different jobs, or tasks from a single career program.
- School-Sponsored or School-Based Enterprise or In-School Clinic: A school-sponsored enterprise or clinic is an enterprise in which goods or services are produced by students as part of their school program. School-sponsored enterprises or clinics typically involve students in the management of a project that may involve the sale of goods or services for use by others. Enterprises may be undertaken on or off the school site, but are always part of the school's program.
- Apprenticeship: Apprenticeship is a voluntary, industry-driven program sponsored by employers, employer associations, and jointly by management and labor. An apprentice, as an employee, receives supervised, structured, on-the-job training combined with related technical instruction in a specific occupation. Apprenticeship is open to anyone age 16 or older; however, an employer may set a higher entry age. Individuals must be age 18 to apprentice in specified hazardous occupations. A training program must be at least 2,000 hours in duration to be considered as an apprenticeable occupation. The Maryland Apprenticeship and Training Council (MATC) is the registration agency for apprenticeship programs. The Apprenticeship and Training Council has approved and registered programs in 207 occupations.

For additional information, contact:
Division of Labor and Industry
Maryland Apprenticeship and Training Program
1100 North Eutaw Street (Room 606) Baltimore, MD 21201
(410) 767-2246 Fax: (410) 767-2220
e-mail: matp@dllr.state.md.us

APPENDIX D: Sample Agenda for On-Site Visit

Sample On-Site Visit Agenda

*The Local School System/Community College/ State-Operated Program
is welcome to develop its own draft agenda*

- 8:30 – 8:45** Arrival and Welcome
- 8:45 – 9:00** Review of Agenda, Brief Document Review, Questions from Review Team
- 9:00 – 10:30** Review Team Interviews School System Central Office Personnel/High School Principals/College Administration/State-Operated Program Executive Administration and Student Services
- 10:30 – 10:45** Break
- 10:45 – 12:15** Review Team Interviews CTE Teachers/Case Managers/Counselors/Counseling Staff/CTE Faculty (reps from all schools/college/state-operated programs)
- 12:15 – 1:00** Lunch Break
- 1:00 – 2:30** Review Team Interviews Students (10 to 15 students from a broad range of CTE programs as well as non-CTE students)
- 2:30 – 3:00** Visit wrap up and questions to Review team
- 3:00** Adjourn

Please provide an electronic copy of the draft agenda to Dr. China Wilson, Equity & Civil Rights Compliance Specialist, 410-767-0180, china.wilson@maryland.gov at least 14-days prior to the visit for review and feedback.

APPENDIX E: Sample Interview Questions

Maryland Consolidated Perkins and Methods of Administration (MOA) Career and Technical Education (CTE) Virtual and On-Site Reviews

Student Questions

1. Please tell us your name, whether you are enrolled in a CTE program (name of CTE program) and your expected graduation date.
2. How did you learn about the CTE Programs offered at your school/college/state-operated program? If there are admissions or eligibility requirements for CTE programs, please tell us what they are?
3. Have you ever been discouraged from taking CTE classes? If so, please tell us about that experience? (Who discouraged you and why?)
4. To your knowledge, if another student has special needs or a disability do they receive support or help for their disability or special needs? Please give an example if you know of one.
5. Do any of you participate in work-based learning, cooperative education, internship programs, or apprenticeships? How did you learn about that program?
6. How are students informed about nondiscrimination policies? Are students able to ask questions about these policies during the information session?
7. How would you file a complaint or grievance if you feel you have been treated unfairly because of sex, race, or disability?
8. Have you ever felt that you or a friend to be the target of discrimination or harassment, or not treated fairly at your school/college/state-operated program or by other students/school staff? By whom? For what reason? Did you file a complaint/grievance as a result of this treatment? If so, what was the outcome? Do you feel your school/college/state-operated program is safe? Please explain.

Faculty/Teacher/ Case Manager/Counseling Staff Questions

1. Tell us which CTE program you instruct. Please estimate the current male/female enrollment in your program(s).
2. Please describe the demographic makeup of your classes by race/ethnicity. Within the last 2 school/academic years, have you observed any conflicts, tensions or complaints relating to the demographic makeup of your program(s)?
3. What efforts are made for recruiting/marketing to underrepresented student populations (e.g. gender, race, disability, etc.) for your program(s)?
4. When a student with a disability or a limited-English proficient student is enrolled in one of your classes, what efforts to accommodate the student's needs are made by your school/school system/college/state-operated program to ensure student success? What resources do you rely on for information/guidance? Please share an example with us.
5. Who do you refer students to when alleged or possible discrimination based on gender, race/ethnicity or disability is brought to your attention. Who is the point of contact to handle discrimination allegations based on gender, race, ethnicity, disability, or protected status?
6. As an employee of the school system/college/state-operated program, please describe the nondiscrimination grievance/complaint policies and procedures regarding protected classifications such as race, sex, and disability. How would you file a grievance/complaint? Where is this information published? How and when are you informed about the nondiscrimination policies/procedures?
7. How do you ensure that counseling/case management/scheduling services are provided in an equitable fashion for all students?
8. What aspects of counseling/case management help break down biases and stereotyping (e.g. regarding disabilities, limited English proficiency, race, etc.) for programs, career choices, and non-traditional careers?
9. What process is used to identify any disproportionate enrollment/placement that may exist in CTE programs by gender, race, disability, national origin, or English language ability?
10. What systems are in place to facilitate student enrollment in non-traditional programs for their gender?
11. How is the racial academic performance gap being addressed by your school/college/state-operated program?
12. If you think discrimination exists at your school/college/state-operated program please explain how you reached this conclusion.
13. Describe your school/college/state-operated program climate. Have there been any changes during your tenure at the school/college/state-operated program?

Central Office / Executive Administrator / Principals Questions

1. Please describe how employees are made aware of the school system's/college's/state-operated program's non-discrimination policies. What policies are they informed about?
2. What procedures are currently in place for employees who have a grievance/complaint regarding discriminatory practices and procedures? Who is the contact person?
3. How are students, employees and the public informed of the contact information for the Title IX, ADA and Section 504 Coordinators?
4. What are the admissions or eligibility criteria for your CTE programs? Please describe the procedure for selective admission programs where there are more applicants than can be accommodated? How were these criteria selected?
5. What is the school system's/college's/state-operated program's process for providing reasonable accommodation services to students with disabilities? What types of accommodations have been made for students with a disability? What resources do you use to ensure a broad level of accommodation is provided to all students with disabilities?
6. What is the school system's/college's process for providing accommodations to guests/patrons (e.g. interpreters for back to school nights for Deaf guests/parents, etc.). How do you publicize and solicit requests for accommodations?
7. Do cooperating CTE program worksites sign formal agreements indicating that they do not discriminate based on race, gender, or disability? How are students selected and placed in work-study, cooperative education, or job placement programs?
8. What process/system is in place to identify disproportionate enrollment by gender, race, disability, national origin or English Language ability in CTE Programs?
9. How is the racial academic performance gap being addressed by the school system/school/college/state-operated program?
10. What are the greatest challenges facing your department/area of responsibility?
11. What are the greatest challenges facing your school system/college/state-operated program?

APPENDIX F: Notice of Non-Discrimination (Sample)

The following sample notice of non-discrimination meets the minimum requirements of the regulations enforced by OCR [Title IX: 34 CFR 106.9; Section 504:34 CFR 104.8; Title IX: 34 CFR 106.8; Section 504:34 CFR 104.7(a)].

The (Name of Recipient/School District) does not discriminate on the basis of race, color, national origin, sex, disability, or age in its programs and activities and provides equal access to the Boy Scouts and other designated youth groups. The following person(s) has been designated to handle inquiries regarding the non-discrimination policies:

Name/ 504/Section II Coordinator Address
Telephone Number
E-mail Address

Name/Title IX Coordinator Address
Telephone Number
E-mail Address

Annual Public Notice of Career and Technical Education Opportunities

OCR Guideline IV (O) requires school systems/community colleges **to annually issue public notification** that all career and technical education opportunities will be offered without regard to race, color, religion, national origin, sex, age, disability, or age. Several requirements encompass an acceptable notice.

The notification must:

- Be made prior to the beginning of **each** school year.
- Advise students, parents/guardians, employees, and the general public of the policy of non-discrimination.
- Contain an assurance that the lack of English language skills will not be a barrier to admission and participation in career and technical education programs.
- Be disseminated to communities of national origin minority persons with limited English language skills in their native language.
- Provide a brief summary of program offerings.
- Provide a brief summary of admission criteria.
- Provide the name and title, office address, and telephone number of the person(s) designated to coordinate Title IX, Section 504, and Age compliance.

Local newspapers, school newsletters, bulletins, memoranda, other publications, and other media are ways for providing this notification.

APPENDIX G: Frequently Asked Questions

Maryland Consolidated Perkins and Methods of Administration (MOA) Career and Technical Education (CTE) Monitoring Reviews

1) What are the federal civil rights laws, regulations and guidelines with which CTE Programs must comply?

All educational institutions that receive federal funds and implement CTE programs are required to adhere to requirements under the Methods of Administration program and Perkins V. Adherence to the following laws and regulations are required:

[Carl D. Perkins Strengthening Career and Technical Education in the 21st Century Act \(Perkins V\)](#)

[Guidelines for the Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs \(MOA Guidelines\) \(34 C.F.R. Part 100, Appendix B\)](#)

[Title VI of the Civil Rights Act of 1964 \(34 C.F.R. Part 100\)](#)

[Title IX of the Education Amendments of 1972 \(34 C.F.R. Part 106\)](#)

[Section 504 of the Rehabilitation Act of 1973 \(34 C.F.R. Part 104\)](#)

[Title II of the Americans with Disabilities Act of 1990 \(28 C.F.R. Part 35\)](#)

2) What do I need to do if selected for a Consolidated Perkins & MOA Monitoring Review?

Educational institutions selected for a virtual or on-site Consolidated Perkins & MOA Monitoring Review will be notified at least 90 days in advance. Identification of the facilities (if applicable) and documents to be reviewed as well as an explanation of the virtual or on-site review process will be provided in a detailed notification letter. The notification will be mailed to the local school system superintendent/college president/state-operated executive administrator and the CTE director/coordinator.

3) What is the compliance review process?

Each year, the Division of Career and College Readiness (DCCR) will release the list of educational institutions identified for on-site and virtual reviews for the following school/program year. Educational institutions identified through the selection plan must demonstrate compliance based on established criteria for Perkins and MOA compliance reviews. Institutions will be required to collect and submit evidence/documentation for all review criteria areas to DCCR at least thirty days prior to the virtual or on-site review. Refer to the p. 11 for more information on the compliance review process. For more information on the established criteria for Perkins & MOA, refer to p. 17.

4) What will happen during the virtual review process and after?

Virtual compliance reviews will require virtual interviews and submission of evidence by the educational institution to the DCCR demonstrating that all criteria have been met. The review team will carefully review all of the evidence/documentation submitted to determine if there are any areas in which the institution was non-compliant with federal civil rights laws and/or regulations. A Letter of Findings (LOF) will be issued to the Superintendent, Chief Executive Office, College President, or State-Operated Program Executive Administrator within 30 days of the completion of the virtual review. The Letter of Findings will describe in detail any areas of non-compliance that were found, specify the necessary corrective actions to be taken, and/or confirm areas reviewed that were compliant. In response to the LOF, the educational institution is required to produce a Consolidated Perkins & MOA compliance plan indicating a timeline and action plan for the correction of all non-compliant findings.

5) What will happen during the on-site review process and after?

On-site compliance reviews will require on-site interviews and submission of evidence by the educational institution to the Division of Career and College Readiness demonstrating that all criteria have been met. The DCCR review team will conduct an initial meeting with the institution's point of contact (POC) and their monitoring review team. After the review team examines the documents provided, on-site interviews of administrative staff, teachers/instructors, and students will be conducted along with an exit meeting to discuss preliminary findings. Additionally, an on-site accessibility review of all facilities at all schools will be conducted. A Letter of Findings (LOF) will be issued to the Superintendent, Chief Executive Office, College President, or State-Operated Program Executive Administrator within 30 days of the completion of the on-site review. The Letter of Findings (LOF) will describe in detail any areas of non-compliance that were found, specify the necessary corrective actions to be taken by the educational institution, and/or confirm all areas reviewed that were compliant. In response to the LOF, the institution is required to produce a Consolidated Perkins & MOA compliance plan indicating a timeline and action plan for the correction of all non-compliant findings.

6) What is a desk audit and when will it occur?

As part of the virtual or on-site review a desk audit will be conducted. The purpose of the desk audit is to review all evidence/documentation that demonstrates compliance of review criteria prior to the virtual or on-site review interviews. Educational institutions will be required to submit Perkins and MOA review documentation, using the Perkins & MOA Review Criteria Lists for [Local School Systems and Community Colleges](#) or [Juvenile Services and Adult Correctional Education](#), to the Division of Career and College Readiness, for a desk audit, at least 30 days prior to the virtual or on-site review. Refer to the timeline of the monitoring process on p. 20.

7) What facilities will be reviewed?

For on-site reviews, the DCCR review team's accessibility specialist will review all areas of the school/facility/college campus required for educational program access. The review may include classrooms, libraries, cafeterias, resource rooms, counseling and

administrative offices, lavatories, parking areas, building entrances, hallways, as well as CTE program areas and other areas as determined. For virtual reviews, the educational institution will complete the Consolidated Perkins & MOA Monitoring Plan facility accessibility evaluation (**Appendix K**) and submit it during the desk audit. The purpose of the facility review is to assure that CTE programs of study and other activities are accessible to, and usable by, persons with disabilities, and that equal educational opportunity is provided.

8) How are educational institutions selected for virtual and on-site reviews?

The Division of Career and College Readiness' state monitoring selection plan identifies the information and procedures used to select systems for review. Refer to p. 12 for more information about the selection plan.

9) How much notice will an educational institution receive prior to a virtual or on-site review?

Educational institutions will receive a Consolidated Perkins & MOA Monitoring Review notification letter from the Division of Career and College Readiness (DCCR). The notification letter will be sent to the Superintendent, College President or State-Operated Program Executive Administrator at least 90 days prior to a compliance review.

10) How should I prepare for a virtual or on-site review?

We encourage educational institutions to identify a point of contact (POC) to coordinate the monitoring review as well as convene a Consolidated Perkins & MOA Monitoring Review Team which may include: local school system superintendent/community college administration official/state-operated program executive administrator, CTE Director/Coordinator/ Administrator, Director of Counseling, Director of Special Education, Case Managers, Title IX Officer, Section 504/Title II Officer, Director of EL/ESOL Services, Director of Facilities/Physical Plant, etc. Refer to p. 23 for more detailed information on how to prepare for the consolidated monitoring review.

11) Who should I contact if I have questions about the monitoring review process?

All questions and inquiries should be directed to Dr. China Wilson. Dr. Wilson leads all technical assistance and facilitation of compliance reviews. Please refer to **Appendix A** for a list of personnel that support facilitation of compliance reviews in school systems and community colleges. The facilitation of compliance reviews of state-operated programs are supported by Dr. Nicassia Belton and Ms. Nina Roa.

APPENDIX H: Compliance Plan Template

[Maryland Consolidated Perkins and MOA Monitoring Compliance Plan Template](#)

You can access the Compliance Plan Template using the link above. Make a copy of the Google Sheet or download to edit the document. This template must be used when submitting Compliance Plan in response to the required corrective actions outline in your Letter of Findings (LOF).

You will need to submit for each finding listed in your LOF:

- ✓ The finding;
- ✓ The corrective action(s);
- ✓ Person(s) responsible;
- ✓ Date to initiate corrective action(s);
- ✓ Description of method(s) used to verify completion of correction action(s) (you will be required to submit the verification evidence to DCCR on completion); and
- ✓ The target completion date.

APPENDIX I: Student Interview Participants Demographic Information

Name of Recipient:

	Last Name	First Name	Middle Name	State Assigned Student Identifier (SASID) Number	Date of Birth (MM/DD/YYYY)
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					

Please Note: This is a “suggested” form. The school system/college/state-operated program is welcome to provide student and instructor demographic data in a form and manner of its choosing.

APPENDIX J: Civil Rights Compliance Helpful Links

- [US Department of Education, Office of Civil Rights](#)
- [Title VI of the Civil Rights Act of 1964](#)
- [Title IX of the Education Amendments of 1972](#)
- [Section 504 of the Rehabilitation Act of 1973](#)
- [Title II of the Americans with Disabilities Act of 1990](#)
- [Vocational Education Programs Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap](#)
- [Carl D. Perkins Strengthening Career and Technical Education for the 21st Century Act \(Perkins V\)](#)
- [Uniform Federal Accessibility Standards \(UFAS\)](#) - for school buildings constructed or altered January 18, 1991 to January 26, 1992
- [1991 ADA Standards for Accessible Design](#) - for school buildings constructed or altered January 27, 1972 to March 15, 2012
- [2010 ADA Standards for Accessible Design](#) - for school buildings constructed or altered March 15, 2012 to present
- [Guidance on the 2010 ADA Standards for Accessible Design](#)
- [ADA Amendments Act of 2008](#)
- [ADA Checklist for Readily Achievable Barrier Removal](#)
- [ADA Best Practices Toolkit](#)
- [Maryland Office of the Deaf and Hard of Hearing \(ODHH\)](#)
- [Maryland Department of Disabilities Technology Assistance Program \(MDTAP\)](#)
- [Web Content Accessibility Guidelines \(WCAG\)](#)
- [National Federation of the Blind \(NFB\)](#)
- [Mid Atlantic ADA Resource Center](#)
- [Common ADA Errors and Omissions in New Construction and Alterations](#)

APPENDIX K: Facilities Accessibility Evaluation

Facilities Accessibility Evaluation for Maryland Consolidated Perkins and Methods of Administration (MOA) Career and Technical Education (CTE) Compliance Reviews

You can review the Facilities Accessibility Evaluation using the link above. Monitored region will be provided with access to the Google Sheet version to complete the document. This evaluation provides a framework for appraisal of common problems or violations that may exist in your college's/school's/state-operated program's facility's buildings regarding access for persons with disabilities and modifications as described by the Americans with Disabilities Act, and guidelines published by the U.S. Education Department Office for Civil Rights.

You will need to:

- ✓ Determine if the facility or portion of the facility is an existing or new facility;
- ✓ Apply the correct accessibility standards by the date of construction (use arrow chart below);
- ✓ Measure the elements and identify any barriers under the accessibility standards; and
- ✓ Outline all corrective actions which must comply with the 2010 ADA Standards.

