



Maryland

STATE DEPARTMENT OF EDUCATION

Maryland Methods of Administration (MOA) State Plan

Office of College and Career Pathways

March 2024

MARYLAND STATE DEPARTMENT OF EDUCATION

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Introduction

The Methods of Administration (MOA) program ensures all students have equal access to high-quality Career and Technical Education (CTE) programs. MOA is facilitated through the United States Department of Education’s Office of Civil Rights. The Maryland State Department of Education (MSDE) is the lead agency responsible for administering MOA requirements across Maryland. The Maryland MOA plan describes how MSDE will implement federal MOA requirements to support equitable student access to CTE programs of study.

The Maryland MOA plan is the essential guide to the MOA process. It describes the MOA process, including the selection process, timelines, compliance areas to be evaluated, and strategies to ensure equity within state CTE programs. Questions or guidance regarding the Maryland MOA Plan may be directed to the Coordinator of Equity and Civil Rights for Career Programs, Brice Thomas, at brice.thomas@maryland.gov, who serves as the state MOA Coordinator.

In Maryland, CTE programs of study are implemented in 24 local school systems, 14 community colleges, and 22 state-operated programs (e.g., Juvenile Services Education and Adult Correctional Facilities). Each entity that implements a CTE program of study and receives federal funds (referred to as “recipients” throughout this document) must adhere to MOA and [Perkins V](#) requirements. [The Office of College and Career Pathways](#) (OCCP) at MSDE is responsible for facilitating the compliance review process to ensure that all recipients comply with federal requirements established by MOA and Perkins V. OCCP uses outcomes from compliance reviews to inform technical assistance, professional learning experiences, and resources provided by the state to recipients to support implementation of practices that support equity in CTE programs statewide.

In October 2019, the Maryland State Board of Education established educational equity as a policy and priority in Maryland public schools. Over the year, the Division of Career and College Readiness (now the Office of College and Career Pathways) collaborated with over 300 stakeholders to revise the vision and direction for CTE in Maryland to ensure that all students have equitable access to high-quality CTE programs of study. In 2020, the Maryland Consolidated Perkins and MOA Monitoring Plan was approved to align the previous MOA plan with the current state CTE goals.

MSDE has served as the sole agency for approving the Maryland Consolidated Perkins and MOA Monitoring Plan. Therefore, the final plan was presented to the Assistant State Superintendent of the Division of Career and College Readiness, the Deputy State Superintendent of Teaching of Learning, and the State Superintendent of Schools for approval.

To better align with the Blueprint for Maryland’s Future, the Maryland MOA Monitoring Plan was revised in August 2023 to depart from its previous iterations of a consolidated Perkins and MOA Monitoring Plan.

Legal and Regulatory Framework

The Maryland MOA plan is purposefully aligned to the [Maryland CTE Four-Year State Plan](#), and the [Blueprint for Maryland's Future](#) to ensure a consistent approach to CTE programs statewide. Maryland state CTE programs are governed by requirements of several federal laws surrounding equity and civil rights. These laws provide all Maryland students with access to high-quality CTE programs:

- [Strengthening Career and Technical Education for the 21st Century Act \(Perkins V\)](#)
- [Guidelines for the Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs \(MOA Guidelines\) \(34 C.F.R. Part 100, Appendix B\)](#)
- [Title VI of the Civil Rights Act of 1964 \(34 C.F.R. Part 100\)](#)
- [Title IX of the Education Amendments of 1972 \(34 C.F.R. Part 106\)](#)
- [Section 504 of the Rehabilitation Act of 1973 \(34 C.F.R. Part 104\)](#)
- [Title II of the Americans with Disabilities Act of 1990 \(28 C.F.R. Part 35\)](#)
- [The Individuals with Disabilities Education Act \(IDEA\), as amended, and the U.S. Department of Education's implementing regulations at 34 CFR Part 300 \(P.L. 101-476;20 U.S.C. § 1400\)](#)

A few Maryland state policies also guide the Maryland MOA plan:

- [The Blueprint for Maryland's Future](#)
- [Equivalent access requirements for students with disabilities \(MD Code, Education, § 7-910 a\)](#)

MOA Compliance Reviews

Part of the MOA process is ensuring facilities offer CTE programs compliant with ADA requirements. OCCP has partnered with the Office of School Facilities to collaborate and address concerns surrounding the physical accessibility of CTE spaces. The MOA Coordinator approves all significant updates or new construction requests for CTE programs to ensure equity in the accessibility of instruction has been considered.

OCCP will lead all MOA compliance reviews including a compliance team of MSDE experts and other stakeholders. In addition to the MOA Coordinator, the MOA compliance team will consist of representatives from across MSDE dependent on necessary support indicated through the selection process. Teams may be comprised of members from:

- Division of Early Childhood
- Division of Early Intervention and Special Education Services
- Division of Student Support, Academic Enhancement and Educational Policy
- Office of College and Career Pathways
- Office of School Facilities
- Office of School Improvement and Transformation
- Office of Teaching and Learning Instructional Programs and Services
- Office of Educator Certification and Program Approval

Compliance reviews may be desk audits or in-person. Both desk and in-person compliance reviews will require interviews and submission of evidence by the recipient to MSDE, demonstrating that all criteria have been met.

The MOA compliance team aims to conduct eight compliance reviews per year. The bulleted list identifies the projected number of reviews that will occur per year for secondary, postsecondary, and state-operated institutions, which include a minimum of two Secondary reviews and one Postsecondary review:

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

Monitoring and Evaluation

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

Entities that implement a CTE program of study and receive federal funds are designated as recipients and are required to adhere to Perkins V and MOA requirements. Maryland recipients include 24 local school systems, 14 community colleges, and 22 state-operated programs. The five largest school systems in the state, those enrolling 75,000 or more students, are subdivided into regions. MOA 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 into regions 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 MOA reviews. As a result, Maryland includes a total of 77 recipients, including:

- 41 Local school system regions
- 14 Community colleges
- 22 State-operated programs.

A detailed listing of the LEAs, community colleges, and state-operated programs can be found in [Appendix A](#).

SELECTION PLAN

The Selection Plan outlines how recipients will be identified for compliance reviews and the type of review (on-site or desk audit) 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 as aligned with the Blueprint for Maryland's Future.

SELECTION CRITERIA

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

- Measure the level of CTE access by demographics, including students involved in advanced placement programs;
- 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 are developed in alignment with Maryland's CTE Comprehensive 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 for ranking and selecting local school systems and community colleges. Points are awarded for access, equity, and quality. Cluster datasets of less than ten are excluded from the analysis to ensure meaningful and reliable analysis of student group disproportionality from year to year. The following categories are used in the scoring of this rubric:

Access (CTE Disproportionate Enrollment):

- Gender
- Disability
- Minority
- Economically Disadvantaged
- English Learner
- Advanced Learners
- Homeless Status
- Foster Status

Equity (CTE Disproportionate Performance):

- Gender
- Disability
- Minority
- Economically Disadvantaged
- English Learner

- Homeless Status
- Foster Status

Quality:

- CTE Program Performance
- CTE Program Integration
- Time Since Last Review

A detailed explanation of the Selection Criteria is available in [Appendix B](#).

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

EXCLUSIONS AND EXCEPTIONS

Local Education Agencies (LEAS): All LEAs are listed based on the final point assignment in order of points awarded from lowest to highest. The top five LEAs with the most points will participate in a yearly compliance review. The LEA with the most points each year will participate in an on-site review, and the remaining four will participate in virtual reviews. School systems also have the option to submit a written request for an on-site compliance review.

- **Exclusions:** Recipients are excluded from further monitoring reviews for two years to allow any corrective actions or action plans to be implemented.
- **Tiebreakers:** If the rankings lead to a tie, the deciding factor is the date of the last review. This would mean the recipient with the longest time since the previous review is selected over the recipient with the more recent review date.
- **Exceptions:** (1) In a case where more than two regions of a single LEA 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 LEA will be chosen. (2) The next ranked recipient will be selected if a recipient cannot be visited due to unforeseen circumstances.

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

- **Exclusions:** Recipients are excluded from further monitoring reviews for two years to allow any corrective actions/action 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 the last review is selected over the recipient (campus site) with the more recent review date. (2) The

next-ranking recipient is selected if a recipient cannot be visited due to unforeseen circumstances.

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

Exclusions: Recipients are excluded from further monitoring reviews for two years to allow any corrective actions/action plans to be implemented.

Compliance and Technical Assistance

MOA Compliance Review Criteria are based on MOA legislative requirements. These criteria provide alignment with school systems, community colleges, juvenile services education, adult correctional education, current required program protocols, evaluation, and reporting requirements. There are 11 review criteria, which span three compliance review categories for local school systems and community colleges. State-operated programs are offered in adult correctional and juvenile residential facilities, where all state-operated programs are open-entry/open-exit, with participation based on those meeting institutional criteria. Additional information on compliance review criteria categories, including detailed descriptions of each criterion and the evidence required, can be found in the Methods of Administration [Desk Audit Monitoring Tool](#) for MSDE. A Letter of Selection is issued to the Superintendent, Chief Executive Officer, College President, or State-Operated Program Executive Administrator within 60 days of the scheduled site visit.

MOA REVIEW PROCESS

The review team, led by OCCP, carefully reviews all the evidence compiled to determine if there are areas in which the recipient was non-compliant with federal civil rights laws and regulations. A Letter of Findings is issued to the Superintendent, Chief Executive Officer, College President, or State-Operated Program Executive Administrator within 30 days of completing the desk audit or on-site visit. The Letter of Findings describes in detail any areas of non-compliance found, specifies the necessary corrective actions to be taken by the recipient, or confirms that all areas reviewed were compliant.

If areas of non-compliance are found, the recipient has 60 days from the date of the Letter of Findings to submit to OCCP an MOA Compliance Plan. The MOA Compliance Plan is required to address each finding of non-compliance with a corrective action plan and includes a specific date by which each finding will be fully addressed and resolved.

The review team analyzes materials submitted by the recipient. If submitted materials appropriately address the findings, then an Acceptance Letter is issued by OCCP to the Superintendent, Chief Executive Officer, College President, or State-Operated Program Executive Administrator. If the submitted material is found to be incomplete or insufficient, a follow-up letter is sent by OCCP specifying the revisions that need to be made.

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

Date of Action	Action Needed	Responsible Party
60 Days Before Compliance Visit	Send a Letter of Selection to the recipient.	OCCP
30 Days Before Compliance Visit	Submit evidence through the voluntary compliance plan that demonstrates compliance with OCCP.	LEA, Community College, or State Operated Program
Day of Scheduled Compliance Visit	Facilitate Desk Audit or On-Site Review	OCCP
30 Days After Compliance Visit	Issue a Letter of Finding (LOF)	OCCP
60 Days After Compliance Visit	Submit a finalized voluntary compliance plan to MSDE outlining actions that will be taken to address items in the LOF.	LEA, Community College, or State Operated Program
60 Days After Compliance Visit	Send Acceptance Letter or Revision Letter	OCCP

TECHNICAL ASSISTANCE

Statewide technical assistance is provided to all recipients. MOA data are used to inform the 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 MOA points of contact from Community Colleges to provide technical assistance and professional development related to MOA. Representatives from state-operated programs are invited to participate in the quarterly meetings. Recipients are notified when new resources are available and when statewide meetings will be facilitated. OCCP works as a team to develop resources and facilitate statewide convenings. Example topics may include:

- Understanding the MOA process;
- Equity in Student Recruitment;
- Opportunity Gap Analysis for CTE programs, and
- Examining Programmatic Data for Equity.

OCCP also provides case-specific technical assistance to individual recipients before or after a compliance review. Recipients can contact the Equity and Civil Rights Coordinator for Career Programs with specific technical assistance requests. Ensuring that all students have access to high-quality CTE programs of study remains a priority for OCCP. The Maryland MOA Plan outlines the process that will be implemented to support educational equity in CTE.

Appendix A: LEAs, Community Colleges, and State-Operated Programs

Local Education Agency	Most Recent MOA Review Year
Allegany County	2024
Anne Arundel County, North	2009
Anne Arundel County, South	2000
Baltimore City, Northeast	2019
Baltimore City, Northwest	2015
Baltimore City, Southeast	2024
Baltimore City, Southwest	1991
Baltimore County, Northeast	2024
Baltimore County, Northwest	1995
Baltimore County, Central	1995
Baltimore County, Southeast	2004
Baltimore County, Southwest	1995
Calvert City	2012
Caroline County	2022
Carroll County	2011
Cecil County	2024
Charles County	2018
Dorchester County	2008
Frederick County	2008
Garrett County	2024
Harford County	2004

Local Education Agency	Most Recent MOA Review Year
Howard County	2016
Kent County	2005
Montgomery County, Cluster 1	2024
Montgomery County, Cluster 2	2011
Montgomery County, Cluster 3	2024
Montgomery County, Cluster 4	1993
Montgomery County, Cluster 5	2021
Montgomery County, Cluster 6	1993
Prince George's County, Region I	2022
Prince George's County, Region II	2014
Prince George's County, Region III	2024
Prince George's County, Region IV	2024
Prince George's County, Region V	2016
Queen Anne's County	2018
St. Mary's County	2024
Somerset County	2009
Talbot County	2017
Washington County	2009
Wicomico County	2013
Worcester County	2013

Community Colleges	MOA Review Year
Allegany College	2019
Anne Arundel Community College	2008
Baltimore City Community College – Harbor, Liberty Heights	2006
Cecil Community College	1993
Chesapeake College – Cambridge Center, Wye Mills	2021
College of Southern Maryland	2000
Community Colleges of Baltimore County – Catonsville, Dundalk, Essex	2021
Frederick Community College	2015
Garrett Community College	2010
Hagerstown Community College	2024
Harford Community College	2017
Howard Community College	2004
Montgomery College – Germantown, Rockville, Takoma Park	2008
Prince George’s Community College	2022
Wor-Wic Community College	2021

State Operated Programs	MOA Review Year
Eastern Correctional Institution - East	None
Eastern Correctional Institution - West	None
Maryland Correctional Institution - Jessup	None
Maryland Correctional Institution - Hagerstown	None
Maryland Correctional Institution - Women	2002
Maryland Correctional Training Center	2002
Occupational Skills Training Center	2021
Patuxent Institution	None
Roxbury Correctional Institution	2002
Western Correctional Institution	None

Juvenile Facilities	
Baltimore City Juvenile Justice Center	None
Garrett Children's Center	None
Cheltenham Youth Detention Center	None
Green Ridge Youth Center	None
Charles H. Hickey Detention Center	None
Lower Eastern Shore Children's Center	None
Mountain View	None
Alfred D. Noyes Center	None
Savage Mountain Youth Center	None
Victor Cullen Center	None
Thomas J.S. Waxter Children's Center	None
Western Maryland Children's Center	None

Appendix B: Selection Criteria

Disproportionate Enrollment	
CTE Disproportionate Gender Enrollment	
Enrollment percentage of students based on gender in CTE programs compared to recipient's enrollment percentage (+/-20% or greater).	+2 points assigned to each cluster that is underrepresented by gender.
CTE Disproportionate Performance for Race	
Enrollment percentage of students based on race in CTE programs compared to the recipient's enrollment percentage (+/-5% or greater).	+2 points assigned to each cluster that is underrepresented by race.
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 underrepresented number of students with disabilities in CTE clusters.
CTE Disproportionate Economically Disadvantaged 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 underrepresented number of economically disadvantaged students in CTE clusters.
CTE Disproportionate English Language Learner Enrollment	
Enrollment percentage of English Learner (EL) students in CTE programs compared to recipient's enrollment percentage of EL students (+/-5% or greater).	+2 points assigned to each cluster having an underrepresented number of EL students in CTE clusters.
CTE Disproportionate Advanced Learner Enrollment	
Enrollment percentage of Advanced Learner students in CTE programs compared to recipient's enrollment percentage of EL students (+/-5% or greater).	+2 points assigned to each cluster having an underrepresented number of advanced students in CTE clusters.
CTE Disproportionate Homeless Enrollment	
Enrollment percentage of homeless students in CTE programs compared to recipient's enrollment percentage of homeless students (+/-5% or greater).	+2 points assigned to each cluster having an underrepresented number of homeless students in CTE clusters.

Disproportionate Enrollment	
CTE Disproportionate Foster Enrollment	
Enrollment percentage of foster students in CTE programs compared to recipient’s enrollment percentage of homeless students (+/-5% or greater).	+2 points assigned to each cluster having an underrepresented number of foster students in CTE clusters.
CTE Disproportionate Protected Status Work-based Learning Enrollment	
Enrollment percentage of students with a protected status participating in work-based learning opportunities compared to the recipient’s enrollment percentage of students with a protected status (+/-5% or greater).	+2 points assigned to each cluster having an underrepresented number of students in protected classes experiencing WBL in CTE clusters.

Disproportionate Performance	
CTE Disproportionate Performance for Gender	
For each CTE cluster, the gender student group did not meet the target for each performance indicator once the target was met in the cluster.	+1 point assigned for each CTE cluster where specific genders did not meet the performance target for each performance indicator.
CTE Disproportionate Performance for Race	
For each CTE cluster, the racial student group did not meet the target for each performance indicator once the target was met.	+1 point assigned to each cluster having an underrepresented number of students with disabilities in CTE clusters.
CTE Disproportionate Performance for Students with Disabilities	
For each CTE cluster, the racial student group did not meet the target for each performance indicator once the target was met in the cluster	+1 point assigned to each cluster having an underrepresented number of students with disabilities in CTE clusters.
CTE Disproportionate Performance for Economically Disadvantaged	
For each CTE cluster, the economically disadvantaged student group did not meet the performance target for each indicator once the target was met.	+1 point assigned for each CTE cluster where the economically disadvantaged student group did not meet the performance target for each performance indicator.

Disproportionate Performance	
CTE Disproportionate Performance for English Learner Students	
For each CTE cluster, English Learner students did not meet the target for each performance indicator once the target was met in the cluster.	+1 point assigned for each CTE cluster where English Learner students did not meet the performance target for each performance indicator.
CTE Disproportionate Performance for Homeless	
For each CTE cluster, homeless students did not meet the target for each performance indicator once the target was met in the cluster.	+1 point assigned for each CTE cluster where homeless students did not meet the performance target for each performance indicator.
CTE Disproportionate Performance for Foster	
For each CTE cluster, foster students did not meet the target for each performance indicator once the target was met in the cluster.	+1 point assigned for each CTE cluster where foster students did not meet the performance target for each performance indicator.
CTE Disproportionate Performance for Protected Status Work-based Learning	
For each CTE cluster, students with a protected status participating in work-based learning opportunities did not meet the target for each performance indicator once the target was met in the cluster.	+1 point assigned for each CTE cluster where protected classes experiencing WBL did not meet the performance target for each performance indicator.

Program Factors	
CTE Program Performance	
Students do not meet performance targets within 90% for each CTE program of study.	+1 point assigned for each CTE program of study for every year target is not met in three years for each performance indicator.
CTE Faculty and Staff Diversity	
The percentage of CTE teachers, administrators, and counselors who are members of a special or protected group compared to the recipient's enrollment percentage of students in the special or protected group (+/-10% or greater).	+1 point assigned for each cluster having an underrepresented number of staff in CTE clusters.
Time Since Last Review	
The number of years since the recipient's last on-site MOA review.	+1 index point assigned for each year. Recipient history is calculated directly into the Index Score.

Appendix C: Templates and Tools

The MOA Compliance Team is committed to ensuring LEAs, community colleges, and state-operated programs have the necessary tools and support to provide equitable access to career programs. Below are links to the MOA Desk Audit Toolkit, the MOA Letter of Selection, The Maryland MOA Compliance Plan Template, and a template for Standard Non-Discrimination Language that can be utilized when needed.

- [MOA Desk Audit Toolkit](#)
- [MOA Letter of Selection](#)
- [MOA Letter of Finding](#)
- [MOA Letter of Revision](#)
- [MOA Letter of Acceptance](#)
- [Maryland MOA Compliance Plan](#)
- [Standard Non-Discrimination Language](#)
- [Glossary of Terms](#)