



**RESTRUCTURING
UNDER THE
NO CHILD LEFT BEHIND ACT
IN MARYLAND**

2007-08
FOLLOW-UP REPORT

RESTRUCTURING UNDER THE NO CHILD LEFT BEHIND ACT IN MARYLAND

2007-08 FOLLOW-UP REPORT

This 2008 report by the Center on Education Policy (CEP) looks at Maryland schools in restructuring, the last and most serious phase of sanctions imposed by the federal No Child Left Behind Act (NCLB). Restructuring is intended to reform dramatically or shut down schools that have failed to make adequate yearly progress (AYP) in raising student achievement for five or more consecutive years.

This report focuses on Maryland schools that were in the planning or implementation phases of restructuring in school year 2007-08 (those that had been identified for improvement under NCLB for four or more consecutive years). The numbers of schools in restructuring cited in this report reflect their status during school year 2007-08. When this report went to press in early September of 2008, Maryland had released the AYP status of elementary and middle schools for 2008-09, based on their state test results from spring 2008, but had not yet released the AYP status of high schools. Because the numbers for 2008-09 were incomplete as of press time, we did not include them in this report. In addition, Maryland reported a decrease in the number of elementary and middle schools in school *improvement* in 2008-09 compared with 2007-08. Without the high school data, however, we could not determine at press time whether the total number of schools in *restructuring* (year 4 of improvement or beyond) had declined between 2007-08 and 2008-09.

This report updates our 2007 publication, *Making Mid-Course Corrections: Maryland School Restructuring*, and is one of a series of CEP reports on school restructuring in five states—Maryland, California, Michigan, Ohio, and Georgia. All of our reports on restructuring, as well as reports from CEP’s broader study of NCLB implementation, are available on the CEP Web site at www.cep-dc.org.

Key Findings

After studying the restructuring process in four Maryland school districts and 10 restructuring schools within those districts, the Center on Education Policy reached several key findings:

- ***The number of Maryland schools in the implementation phase of restructuring decreased slightly between school years 2006-07 and 2007-08, but the number in the planning phase of restructuring soared.***¹ During this period, the number of schools in restructuring implementation fell from 69 to 64, a 7% decrease. All 64 schools had urban characteristics, and most (61%) were in the Baltimore City school district. At the same time, the number of Maryland schools in restructuring planning grew from 4 to 38, a nearly tenfold increase. State officials interviewed for this study attributed this growth to the application of NCLB standards to a new set of schools beginning in 2004, rather than to a general decline in school performance. The bulk of Maryland schools in restructuring implementation were first placed in restructuring implementation in 2002 due to their low performance under the federal and state accountability requirements that preceded NCLB. In 2004, however, a new group of schools were first identified for improvement under NCLB standards, and these schools have now entered restructuring implementation.
- ***Between school years 2004-05 and 2007-08, 12 schools in restructuring implementation, or 16%, have raised student achievement enough to exit improvement.*** During this same period, an additional 15 schools exited the planning phase of restructuring before having to implement their plans.
- ***The “turnaround specialist” option for restructuring is losing favor in Maryland, while the option of replacing most or all of the school staff***

¹ At the time this report went to press, the total number of Maryland schools in restructuring for 2008-09 was not yet available.

(which may include replacing the principal) has become more widely used. Although the state eliminated the turnaround specialist as an option for schools entering restructuring implementation after 2006, a majority (58%) of Maryland schools in restructuring implementation in 2007-08, or 37 of these schools, continued to use turnaround specialists. The vast majority (95%) of schools in restructuring planning in 2007-08, or 36 schools, selected staff replacement as their option for changing school governance if they enter restructuring implementation in 2008-09. Furthermore, officials in two districts we studied noted that they intended to eliminate turnaround specialists and switch to replacing school staff in some schools that were already in restructuring implementation.

- ***The downsides to replacing all or most of the school staff appear to have dissipated in schools that have implemented this restructuring option.*** Lower staff morale and a shift in teachers' focus to job security issues seem to have been short-term consequences of staff replacement.

Background on the Study

This is the third annual CEP report on restructuring in Maryland. To gather information for this report, Brenda Neuman-Sheldon, a CEP consultant, interviewed Maryland state department of education officials and talked with administrators, principals, teachers, and other school staff in four Maryland districts and in 10 restructuring schools within those districts. These "case study" districts included Anne Arundel County Public Schools (AACPS), Baltimore City Public School System (BCPSS), Baltimore County Public School System (BCPS), and Prince George's County Public Schools (PGCPS). Neuman-Sheldon also reviewed state, regional, district, and school data and documents, such as state restructuring and school improvement policies, state records tracking restructuring implementation, state report cards, and state test score data. Data collection took place from February through May 2008.

Numbers of Schools in Restructuring

Under the No Child Left Behind Act, schools and districts are expected to make adequate yearly progress in raising achievement, as determined by the percentage of students scoring at or above the proficient level on state tests and other indicators. Schools that do not make AYP for two consecutive years are identified for improvement and must undertake a series of increasingly serious steps. After five consecutive years of not making AYP, schools must plan for restructuring (year 4 of the improvement process), choosing from among a menu of options in federal law designed to completely revamp the school. After six consecutive years of not making AYP, schools must implement their restructuring plans (year 5 of improvement). Schools exit restructuring if they make AYP for two consecutive years. Neither the NCLB statute nor the U.S. Department of Education (ED) regulations offer guidance for what happens to schools beyond year 5 of improvement. Maryland's emerging approach for supporting schools that remain in restructuring for multiple years is discussed later in this report.

Maryland, a state that enrolls about 850,000 students in grades K-12, has a well-established testing and accountability system. Consequently, some Maryland schools entered restructuring planning as early as 2003-04.

NUMBER OF SCHOOLS IN RESTRUCTURING PLANNING AND IMPLEMENTATION

In 2007-08, about 16% of Maryland's 1,444 schools, or 227 schools, were in NCLB improvement. (Maryland applies the NCLB sanctions to all schools, not just the 366 schools that receive federal Title I funds for low-achieving children in low-income areas.) Of the Maryland schools in improvement that year, 38 (11 Title I and 27 non-Title I) had reached the planning phase of restructuring and 64 (41 Title I and 23 non-Title I) had reached the implementation phase, for a total of 102 schools in restructuring, or about 7% of Maryland's schools.

These restructuring schools included 80 elementary and middle schools and 22 high schools. All but two of the restructuring schools were located within or on the fringes of two large urban areas, Baltimore and Washington, D.C. The Baltimore City district

Table 1. Maryland Schools Entering and Exiting Restructuring

Year	Number of Schools in Restructuring Implementation	Schools That Exited Restructuring Implementation	Number of Schools in Restructuring Planning	Schools That Exited Restructuring Planning
2004-05	46	2 (4%)*	38	12
2005-06	63	5 (8%)	15	2
2006-07	69	5 (7%) [†]	4	1
2007-08	64	NA [‡]	38	NA [‡]

Table reads: In 2004-05, 46 Maryland schools were in the implementation phase of restructuring. Two schools, or about 4% of the schools in restructuring implementation, made sufficient gains in student achievement to exit restructuring at the end of 2004-05. In 2004-05, 38 schools were in the planning phase of restructuring. Twelve schools made sufficient gains in student achievement to exit school improvement after the end of 2004-05.

*Three additional schools in restructuring implementation closed at the end of the 2004-05 school year.

[†]Two additional schools in restructuring implementation closed at the end of the 2006-07 school year.

[‡]At press time, Maryland had released the AYP status for 2008-09 of elementary and middle schools but not high schools. As a result, the total number of schools that had exited restructuring after the end of school year 2007-08 could not be determined.

Source: Maryland State Department of Education documentation provided by Sandra Toomey, February 2008; and Maryland Report Card, <http://mdreportcard.org/>.

accounted for 61% (63 schools) of all restructuring schools and 83% (43 schools) of Maryland's Title I schools in restructuring.

As displayed in **table 1**, the 64 Maryland schools in restructuring implementation in 2007-08 represented a 7% decrease from the 69 schools in this phase during the previous year.

NUMBER OF SCHOOLS EXITING RESTRUCTURING

Despite the recent decrease in schools in restructuring implementation, more schools have entered this phase of restructuring over the past four years than have exited. Five schools, or 7% of those in restructuring implementation, improved student performance enough to exit restructuring after the 2006-07 school year. Between school years 2004-05 and 2007-08, 12 schools, or 16% of those in restructuring implementation, have exited (not counting schools that have closed). Ten of these schools were using a turnaround specialist, and two contracted with a private management company to operate the school.

INCREASE IN SCHOOLS IN RESTRUCTURING PLANNING

Table 1 also shows the leap in the number of schools entering restructuring planning between 2006-07 and 2007-08—an almost tenfold increase from 4 to 38 schools. The greatest increases occurred in Prince George's County (increased from 3 to 21), Baltimore City (from 0 to 11), and Baltimore County (from 1 to 3). Additionally, in three districts—Harford County, Montgomery County, and St. Mary's County—one school entered restructuring planning for the first time since NCLB took effect.

Neither state nor district officials attributed the sharp rise in schools in restructuring planning to any systematic declines in performance among Maryland schools as a group. Rather, officials from the Maryland State Department of Education (MSDE) noted that when the state first began applying NCLB sanctions, those schools with the longest histories of academic struggles were immediately placed in restructuring planning. Another set of schools were first identified for NCLB improvement in 2004, after not making AYP for the first two years of NCLB implementation. Schools in

this latter group have now been in improvement for four years and have entered restructuring. Ann Chafin, assistant state superintendent for student, family and school support, explained the phenomenon in this way:

I don't think it's because of anything different that's happened or that anything's gotten worse or gotten better . . . I think it's that bubble moving along, and I think if you would look across the nation at states that didn't have accountability [systems before NCLB], you would see they had a sharp rise this year as you [increased] those number of years [of] not making AYP . . .

This increase in the number of Maryland schools in restructuring planning has raised new issues for the state and local districts, including how to restructure alternative schools and how to oversee the large number of restructuring plans that must be developed.

For the first time, “alternative” schools in Maryland have entered restructuring. These schools, which serve a wide variety of students from juvenile offenders to expectant mothers, present unique challenges to the state in determining the most effective way to restructure. These challenges include whether to assign students’ test scores for AYP purposes to the alternative school they attend (for reasons of special placement) or the “sending” school; how to make substantial changes to schools that serve constantly changing students bodies, such as expectant mothers; and how to restructure an alternative school without diminishing its special purpose, such as serving students with disabilities. State officials acknowledged that they are struggling with these challenges and that this kind of restructuring involves nuances not addressed by the NCLB legislation.

An even more pressing issue confronting the state and school districts is how to address the logistical challenges of creating restructuring plans for many more schools, reviewing all of the paperwork, and providing appropriate support to each district and school.

The capacity of the state and our case study districts to continue the same level of services to all restructuring schools has been stretched thinly. While officials in all four case study districts noted that they had a close working relationship with MSDE, they have observed the strain on the state resulting from all of the schools in restructuring planning.

Donna Muncey, chief accountability officer for the Prince George’s County Public Schools, observed that developing 21 restructuring plans has taken an extraordinary amount of time on the part of the district’s senior leadership teams, the regional assistant superintendents and their staff, the school improvement department, and other entities. Debra Mahone, director of school improvement and accountability for the Prince George’s County Public Schools, echoed this sentiment:

It was certainly a much different initiative this year than it has been in the past when we only had one school, which was Arrowhead, to move into restructuring planning. This year with the 21 [schools] it required much more focused target support and a timeline that allowed us to provide the support to schools on an incremental basis.

The state department of education has taken several steps to deal with the many schools in restructuring planning. First, it reduced the paperwork and information required of schools and districts submitting restructuring plans, as noted by Teresa Knott, MSDE supervising coordinator for school performance:

This year, because of the sheer numbers of schools that are in restructuring planning . . . we had to reduce the amount of information that we've requested from the schools. Last year we had two separate documents that came in, an alternative governance document and then a school improvement plan with the governance document embedded within it. This year we took the best of both of those documents . . . and we put it into one document.

Second, state officials encouraged school districts with multiple schools in restructuring planning to present a district executive summary to the state board of education that not only outlined how schools would implement their restructuring options but also described how the district would support the plan. District officials said that this will go a long way toward ensuring that restructuring plans are not just paper promises but workable instruments of change. This action grew out of a concern among state officials that larger districts were not individualizing plans for each school but instead were presenting similar plans, centered on replacing school staff, for all of their schools. Moreover, state officials were concerned that districts with multiple

schools in restructuring would have difficulty approaching restructuring tasks and allocating fiscal and human resources to many schools at the same time. Teresa Knott explained how the state sought to address these concerns:

I think, for instance, with Prince George's County . . . we realized that there were a lot of similarities across the schools, and so this was alarming me that they weren't being individualized, and maybe they were doing some cut and paste . . . So I called the county, and we went down there and had a meeting with [them] . . . [W]e decided the best way to do it was for the schools not to be submitting a summary of everything that they're doing [because] all of the summaries were starting to look alike . . . but for the county to submit one broad summary that would really say how the county is approaching restructuring in 21 schools this year.

Third, the state education department has also begun to assess its capacity to support the increased number of schools implementing restructuring plans during 2008-09. Toward this end, the state has taken steps to develop a “breakthrough center,” which will be responsible for prioritizing district and school needs and brokering services across MSDE departments. JoAnne Carter, MSDE deputy superintendent for instruction and academic acceleration, described the concept of this center, which was not yet fully operational during 2007-08:

[W]e are no longer looking at silos in terms of what the various divisions have to offer, but we're looking at everything that is available in this department that provides support to schools at different levels of improvement, putting it within the model, and . . . [delivering services] in a way that assures that [schools] are getting quality support out of the department and not more a piecemeal approach or that we're replicating what one another are doing. It's going to be much more responsive to what districts really need. And it's going to become a part of the statewide system support of pooling our resources . . .

At the district level, both Baltimore City and Prince George's County have been working with schools in restructuring planning for well over a year to help them prepare their restructuring plans. In some cases, this district assistance began before the schools officially entered the planning phase of restructuring.

According to Kim Ferguson, interim director for school improvement, Baltimore City has organized multiple meetings to prepare the whole group of schools in restructuring planning for the restructuring process. The district has also created a districtwide restructuring team to help schools in restructuring create and implement their restructuring plans. The team includes representatives from all central office departments with a role in restructuring, including human resources, legal services, and curriculum and instruction. The team, which meets weekly, has created a calendar for both the district and schools to roll out what the state calls zero-based staffing—Maryland's version of staff replacement, which involves replacing a substantial portion of the school staff or asking all staff to reapply for their positions.

Baltimore City is also providing support to restructuring planning schools through the district's school improvement office. This marks a change from 2006-07, when the office worked only with schools in restructuring implementation that were using a Restructuring Implementation Specialist (RIS) as their restructuring option. Ferguson explained the new role of coordinators from the district school improvement office in working with schools in restructuring planning:

Some schools are really struggling, but that's where we come in and try to provide the support, the coordinators here . . . [E]ach of them [is] assigned maybe about two . . . schools that are in planning . . . They're usually there at least once, maybe twice, a week, giving that hands-on support.

Prince George's County provided advice about “pre-planning” for restructuring to schools that were in corrective action during 2006-07 and were likely to move into restructuring planning in 2007-08. During the district's Bridge to Excellence School Improvement Planning Institute held in the summer of 2007, staff from the district and the state education department explained the process for restructuring planning, the restructuring options, the requirements and timelines for developing plans, and the “type of pre-service they would need to put in place . . . to complete this very lengthy proposal,” said Debra Mahone of the Prince George's district staff.

In addition, Prince George’s district staff met with these schools several times throughout the summer and conducted a fall workshop for high schools entering restructuring planning. MSDE conducted an additional half-day workshop to train school staff in the Teacher Capacity Needs Assessment (TCNA), which the state requires schools to use as part of the restructuring planning process.

Maryland Restructuring Strategies and Supports

Over the past three years, the Maryland State Department of Education has taken an active and proactive role in transforming restructuring strategies and supports. Building on the experiences of the earliest restructuring schools, Maryland has become more actively involved in managing restructuring through regulating restructuring options, centralizing support, and providing greater support and technical assistance to restructuring schools. Below we describe Maryland’s options for restructuring, funding allocated to restructuring schools, and state supports for these schools.

STATE OPTIONS FOR RESTRUCTURING

The No Child Left Behind Act outlines five options to transform the governance of schools in restructuring. One of these options, that of turning over school governance to the state, is not permitted by the state of Maryland. The remaining four federal options are listed in **table 2**.

Within the federal options, Maryland has established a list of more specific restructuring options from which districts and schools must choose. This list, which is also shown in table 2, has changed over time as the state has gained more experience with restructuring. Beginning in 2006-07, Maryland further limited the federal option of undertaking “any other” major restructuring of school governance to a single choice—appointing or employing a distinguished principal from another school district or from New Leaders for New Schools, a national nonprofit organization that selects and trains current and former educators to become urban public school principals and that has programs in Baltimore and other cities. Beginning in 2007-08, Maryland also allowed three restructuring schools in Baltimore City to partner with Towson

University to become University Partnership Schools (UPS) as their restructuring option. UPS is aimed at building professional learning communities within and between schools.

Number of Schools Using Various Restructuring Options

Table 2 shows the number of schools using the various restructuring options available in Maryland since 2005-06. Because schools that were already in restructuring implementation were not subject to the state’s more restricted options, they could continue to use an option they had chosen earlier.

Turnaround Specialists Falling Out of Favor

In 2006-07, Maryland eliminated the turnaround specialist as one of the options for making “any-other” major change in governance for schools entering restructuring implementation. In addition, two districts made substantial changes to the roles and responsibilities of the turnaround specialist. Now, in 2008-09, the turnaround specialist has fallen even further out of favor. District officials in both Baltimore City and Prince George’s County reported that some restructuring implementation schools using turnaround specialists are planning on changing their restructuring option for 2008-09.

Prince George’s County plans to have four schools in restructuring implementation submit new restructuring plans that will change their option from using a turnaround specialist to replacing school staff. According to Donna Muncey, these four schools have been in restructuring implementation for a number of years with minimal improvement, and the district is looking forward to the opportunity to implement substantial changes in these schools.

Similarly, Andrés Alonso, chief executive officer of the Baltimore City schools, said that in 2008-09, the district will begin to eliminate the RIS as a restructuring option and will begin replacing staff in all schools in restructuring implementation.

Table 2. Number of Maryland Schools Implementing Restructuring Plans Using Various Options

Federal Restructuring Options	Maryland Restructuring Options	Number of Schools Using Option, 2005-06	Number of Schools Using Option, 2006-07	Number of Schools Using Option, 2007-08
Enter into a contract to have an outside organization with a record of effectiveness operate the school	Enter into a contract with an entity such as a private management company to operate the school	1	1	1
Reopen the school as a charter school	Reopen the school as a public charter school	1	1	1
Replace all or most of the school staff who are relevant to the failure to make AYP	Replace all or most of the school staff	5	8	9
Undertake any other major restructuring of the school's governance that produces fundamental reform	Have the district central office take over the principalship of the school	0	2	2
	Appoint a school "turnaround specialist"	47	44	37
	Close the school and reopen as a complete school of choice	0	0	0
	Use an external reform model	0	0	0
	Replicate the governance of a charter school	0	1	1
	Appoint a distinguished principal	NA	2	1*
	Use the Blueprint for High School Reform and Derivative High Schools models	10	10	9*
	Become University Partnership Schools in Baltimore City	NA	NA	3

Table reads: In school year 2005-06, five Maryland schools chose to replace all or most of the school staff as their restructuring option. In 2006-07, eight schools were using this option.

*One school using this option closed at the end of school year 2006-07.

Source: Center on Education Policy, *Maryland State Department of Education Alternative Governance Rubric*, December 2006; and documentation provided by Teresa Knott, March 2008.

Replacing School Staff Rising in Popularity

Although not all restructuring plans had been submitted to or approved by the state at the time this report was completed, state and district officials confirmed that all these new plans included some form of zero-based staffing—replacing all or most of the school staff or asking all staff to reapply for their positions—as their restructuring option. This marks a change from the past. When the first wave of schools entered restructuring in 2003, the vast majority of these schools had coalesced around the option of using a turnaround specialist. Between 2004 and 2008, 64% of the schools in restructuring implementation have used a turnaround specialist. But if all, or even most, of the 38 schools in restructuring planning remain in restructuring in 2008-09, then replacing school staff will be the most common restructuring option in Maryland.

State officials pointed out that the staff replacement option offers a chance to achieve greater parity in staffing among schools by moving highly qualified teachers to schools with the greatest needs. The state and district officials we interviewed, however, did not address the issue of where the less qualified teachers would go, or whether sufficient numbers of highly qualified teachers are available to fill the newly created openings. Kim Ferguson of Baltimore City said the district hopes that through school closings and alternative teacher certification programs, enough “good” teachers will become available.

In prior CEP reports describing school restructuring in Maryland, school and district officials commented on the disruptive nature of replacing school staff and the potential negative impact of this strategy. School and district staff had all seen lowered school morale, disruptions to instruction caused by teachers’ concerns over job security, and excessive burdens placed on the principal when interviewing job candidates. According to interview respondents, these negative consequences appear to have been short-lived. The principals all noted that once the process of rehiring new staff had been completed and the new school year began, the turmoil disappeared. “The zero basing piece is not a part of this school,” explained Don Lilley, principal of Annapolis Senior High. “This group is way past that.”

Representatives from all three districts included in this study reported that individual schools independently selected the staff replacement option after going

through their own planning process. However, several state and district officials commented that they had little actual choice, given the state’s limitations on restructuring options. “The choices were so limited that I think they just looked at it honestly as the lesser of four evils,” said Kim Ferguson of Baltimore City. Donna Muncey of Prince George’s County concurred, remarking that although “each conversation with each school has been different . . . in reality there really isn’t a lot of choice among options.”

District officials further explained why they believe there is little real choice in restructuring options. Both Ferguson and Muncey pointed out that the planning process for becoming a charter school takes about 18 months, which does not fit with the required federal restructuring timeline. They also noted that using a distinguished principal was not attractive to schools because this option does not have a very positive track record at the secondary level (the level served by most restructuring planning schools) and because principals are rarely willing to replace themselves. Ferguson further noted that school stakeholders did not believe that private management companies would be able to improve schools sufficiently.

Mary Minter, chief academic officer in the Baltimore City district, theorized that school principals did not understand the full implications of staff replacement when they selected this option for their school:

But [the staff replacement] option may require the replacement of the principal. They didn’t know zero-basing could also mean [replacing the principal as well]. That sort of came later on . . . “You mean I can be replaced, too?” It was after the fact. I think had they known, they would not have selected that option.

Andrés Alonso, Baltimore City’s CEO, agreed that principals were unaware that staff replacement included replacing the school administration, and he expressed surprise that principals were willing to pursue this option. “I find it difficult to believe that in every single case, something which should be so basic to the conversation has escaped the debate until the very end,” said Alonso.

All the district officials interviewed mentioned that replacing school staff is only one part of their schools’ restructuring plans. Kim Ferguson said that staff

replacement is a “necessary but not sufficient” element of restructuring in Baltimore. Donna Muncey observed that staff replacement in Prince George’s included “a bundle of associated activities that are more than just replacing staff.”

Furthermore, replacing staff as a restructuring option is not being implemented in exactly the same manner in each district. For example, Annapolis Senior High School’s approach required all staff, from the principal to custodial staff, to reapply for their jobs. In contrast, Arrowhead Elementary in Prince George’s County focused on replacing teachers who did not meet the NCLB definition of “highly qualified,” as well as staff who, in the view of school and district leaders, were responsible for the school not meeting AYP targets.

STATE FUNDING FOR RESTRUCTURING

State School Improvement Grants (SSIGs) are available to both Title I and non-Title I schools in all stages of improvement. SSIG applications are considered separately from school restructuring plans, and SSIG funds are awarded to entire districts rather than individual schools. SSIG funding is appropriated annually by the Maryland General Assembly and awarded to school systems in the form of a grant. In 2007-08, districts received \$10,000 for each school that was in improvement or had exited improvement based on its 2007 test scores, plus \$33.63 per pupil. Beginning in 2007-08, high schools were awarded an additional \$29.13 per pupil. The state decided to distribute additional money to high schools in improvement to help these schools prepare students for the state High School Assessments, which will be a graduation requirement for the first time in 2009.

According to MSDE officials, Maryland distributed \$11,379,600 in SSIG funds to the 16 school districts with schools identified for improvement. MSDE officials reported that the state monitors the use of SSIGs to ensure they are focused on specific school initiatives. Additionally, \$7,145,298 in federal Title I school improvement funding was awarded to seven school districts with schools in restructuring or other stages of improvement.

ADDITIONAL GUIDELINES AND SUPPORTS FROM MSDE

In 2007-08, MSDE made a few relatively minor changes to the supports and processes for schools in improvement, including those in restructuring.

First, the Teacher Capacity Needs Assessment, which had been a voluntary piece of the restructuring planning process in 2006-07, is now a requirement for all schools submitting a restructuring plan. In conjunction with this new requirement, MSDE staff members conduct half- or day-long training sessions, depending on time allotted by the districts for districts and schools in conducting the TCNA.

Second, MSDE has worked on modifying and improving the Restructuring Implementation Technical Assistance (RITA) process. RITA is intended to assist schools that have been in restructuring implementation for at least three years and appear to not be making progress. Based on experiences from a 2006-07 pilot, the state has increased the site visits included in the process from one to two days and has refined the standards and indicators used to identify which programs and systems are effective in raising student achievement and which need to be improved or eliminated. At the time we collected data for this study, MSDE had not begun conducting RITA site visits but intended to do so in March 2008.

Maria Lamb, director of the state Program Improvement and Family Support Branch, explained that MSDE received a grant from the U. S. Department of Education in early 2008 to support Title I schools in restructuring implementation for three or more years. MSDE plans to use the funds to support RITA.

MSDE also provides additional support to Baltimore City and Prince George’s County, not only because these districts are in corrective action but also because they have many schools in improvement. This support has included principal leadership programs and assistance for principals in learning how to monitor instruction.

Other forms of state assistance, although not designed specifically for restructuring schools, may benefit these schools. For example, the state provides training in a process called Positive Behavior Intervention and Support (PBIS) that aims to improve school discipline and student behavior. In addition, MSDE provides

professional development to district staff and school leadership teams that focuses on improving understanding of content and instructional strategies in reading/English and math. As a follow-up, MSDE staff members are assigned to specific schools in improvement to support school leadership teams as they collaborate with teachers to apply content and instructional strategies learned at these professional development sessions.

RESTRUCTURING IN CASE STUDY DISTRICTS AND SCHOOLS, 2007-08

Most of the notable changes that occurred in our case study districts and schools during school year 2007-08 were *plans* for change that were not scheduled to take effect until school year 2008-09. In 2007-08, many of the changes instituted by the state and districts were built on the changes from the previous year.

As in prior years, all of the districts and schools in this study engaged in similar activities to improve student test scores, regardless of which restructuring option they had chosen. These activities included the following:

- Offering tutoring outside the regular school day, separate from Title I supplemental educational services
- Increasing instructional time in reading and math
- Using assessment data diagnostically
- Providing professional development
- Making scheduling changes

The next four sections of this report describe our findings about specific case study districts and schools.

Anne Arundel County Public Schools

Anne Arundel County contains rural, suburban, and urban areas and includes Annapolis, the state capital. The county's northern tip adjoins the southern edge of Baltimore City, and its eastern border lies along the Chesapeake Bay. The Anne Arundel County Public Schools district enrolls about 73,000 students, of whom 71% are white and 22% are African American. About 18% of AACPS students are low-income. Fourteen of the district's 118 schools were Title I schools in 2007-08.

In 2007-08, AACPS had seven schools in improvement, none of which are Title I schools. Based on 2007 state tests, the district made AYP. Annapolis Senior High School, a focus of our study, did not make AYP based on 2007 testing; the subgroups of students with disabilities and low-income students fell short of AYP targets, and the school as a whole did not meet the required graduation rate. The school was in restructuring planning during school year 2007-08. At the time we went to press, the results of the 2008 High School Assessments had not been released.

ANNAPOLIS DISTRICT STRATEGIES AND SUPPORTS FOR SCHOOLS IN IMPROVEMENT

As described in previous reports, the Annapolis district operates an Office of Continuous School Improvement staffed with individuals who assist schools with their school improvement plans. The district also conducts Instructional Program Reviews to monitor school instructional practices.

In addition, AACPS created academic steering committees for schools in improvement during 2007-08. These committees were modeled after the committee put together to support Annapolis High School in 2006-07 and include members of the district executive team, department coordinators, and senior staff. The committees meet with school administrators at least quarterly and in some cases monthly. They are charged with supporting the needs of the schools by giving administrators direct access to district officials and with monitoring school progress. "We get together and review the data and talk about supports for the school—what's needed, where are they—and we're monitoring their progress," said George Arlotto, chief school performance officer for AACPS.

Although AACPS had two schools in corrective action during school year 2007-08, the district chose not to undergo a major restructuring initiative with those schools, as it had done with Annapolis High School.

RESTRUCTURING AND SUPPORTS AT ANNAPOLIS SENIOR HIGH SCHOOL

During school year 2006-07 and in the summer of 2007, Annapolis High School replaced approximately 40% of the school staff. All of the teachers hired to work at the high school were given new 12-month

contracts that included financial bonuses for making a three-year employment commitment and improving student performance.

In addition to replacing staff, the high school has put in place a comprehensive set of reform efforts, including the following:

- A three-week summer bridge program for 8th grade students entering the high school
- A 9th grade academy emphasizing small, personalized learning communities
- Academic chairpersons responsible for analyzing data and working with students who need assistance to improve their performance on the state high school exam
- Community ambassadors serving as liaisons between families, the greater community, and the school
- Grade reports sent to parents every two weeks
- Advisory periods for students
- Summer workshops and inservices for teachers
- Team planning time for teachers in the summer

Annapolis High School restructured while still in the corrective action phase of NCLB sanctions. Once the school entered restructuring planning, however, it was still required to write and submit a restructuring plan. According to Kevin Maxwell, AACPS superintendent, MSDE made some accommodations for Annapolis High School regarding its restructuring plan. The state did not require the school to choose a new restructuring option but rather allowed the district to submit a restructuring plan that described the “early” restructuring process the school had already undergone during its year in corrective action. The plan that the school submitted outlined “what they did, what they’re currently doing, and what they’re still going to be doing next year,” said Teresa Knott, a state supervising coordinator.

While the state would have been well within its rights to require Annapolis High School to write and implement an entirely new restructuring plan, the state viewed the approach it took as a “proactive” one, said Ann Chafin, an assistant state superintendent. She explained further:

[I]f we were not thinking and paying attention, we would’ve said, “Okay, that was your corrective action year. Now, what are you doing for an alternative governance [mechanism]?” And it would’ve made absolutely no sense . . . You have to honor that kind of commitment in doing this, and we work in partnership with these districts.

Nearly all supports for Annapolis Senior High School were the same in 2007-08 as in the prior year. District personnel continued to work closely with the school, providing guidance and support through the senior manager of secondary school improvement and an academic steering committee. The school continued implementing its restructuring plan and finalized staff replacements. There were three notable changes to district supports to Annapolis High School.

- The district assigned to the school two, instead of four, AYP content specialists who coach teachers and help identify students in need of support.
- The co-principal assigned to assist Principal Don Lilley while he interviewed prospective staff as part of the staff replacement process was no longer at the school.
- The principal met monthly with the district superintendent to discuss restructuring efforts.

District and school representatives all noted positive results at Annapolis High School in the first year after staff replacement, while acknowledging that the school has a long way to go and that it is far too early to truly assess the success of their efforts. District and school officials cited several indicators of improved school performance under the restructuring plan, including a decline in the number of student behavior referrals, improved student grades, especially among 9th grade African American males, improved student attendance, and higher enrollments in honors and AP courses. George Arlotto noted that the school environment has improved:

The building just has simply a different feel to it. The kids appear to be more academically engaged. When the kids are passing between classes you see teachers standing at their doors having conversations with kids and you know that they’re developing relationships. It [is] just a very different place and you can’t—there’s no data to show that.

As we noted in last year's report, the restructuring effort at Annapolis High School is an expensive endeavor, requiring around \$3 million to pay for the bonuses and additional time included in the new teacher contracts. Anne Arundel County district officials said that although there was no additional money earmarked for this high school in the 2007-08 budget and although funding for the restructuring has strained the district, they will maintain their three-year commitment to the effort.

Baltimore City Public Schools

Baltimore is the only large city in Maryland. Like many cities, Baltimore suffers from declining population, violence, drug problems, and deeply entrenched poverty. In the past seven years, the Baltimore City Public School System has had five chief executive officers, including Andrés Alonso, the current CEO, who assumed the position in the summer of 2007. Other changes in key district personnel have occurred during the past year.

The Baltimore City district serves a student population that is 89% African American and 72% low-income. Of the district's 194² schools, 122, or 63%, are Title I schools. Altogether, 45% of the district's schools are in some stage of NCLB improvement. Particularly telling is the fact that 39% of all Maryland schools in any stage of NCLB improvement, as well as 61% of all Maryland schools in restructuring implementation, are located in Baltimore City.

Based on its 2007 test results, the Baltimore City district failed to make AYP for the fifth year and was identified by the state for corrective action. At the elementary level, the subgroup of students with disabilities fell short of AYP targets in both reading and math. At the middle school level, African American, Hispanic, and low-income students, as well as students with disabilities, English language learners, and students overall, failed to make AYP. At the high school level, the district failed to make AYP for students overall in reading and math.

In 2007-08, 53 BCPSS schools, including 39 Title I schools, were in restructuring implementation. Eleven of these were high schools—the only high schools in Maryland implementing restructuring plans.

Baltimore City schools were implementing a variety of restructuring plans. The turnaround specialist, which BCPSS calls a restructuring implementation specialist, or RIS, remained the most popular option.

Our study included four Baltimore City Schools:

- ***Guilford Elementary/Middle School*** has been in restructuring implementation since 2004 and has used a RIS as its restructuring option. The school made AYP in all areas in 2006 but failed to do so in 2007, falling short overall in reading and missing AYP targets for various subgroups in reading or math. The school made AYP based on 2008 assessments; if it makes AYP again in 2009, it will exit improvement.
- ***Mary E. Rodman Elementary School*** has used a RIS as its restructuring option since entering restructuring implementation in 2004. In 2006, the school missed AYP targets for most subgroups in reading and math. In 2007, multiple subgroups fell short of AYP targets in reading, but all subgroups except students with disabilities met targets in math. Again in 2008, several subgroups fell short of AYP targets. The school failed to make AYP for students overall and for various subgroups in math, and for students with disabilities in reading. The school remains in improvement.
- ***Morrell Park Elementary/Middle School*** entered restructuring implementation in 2006 and chose to replicate a charter school's governance as its restructuring option. The school did not make AYP for multiple subgroups in reading and math in 2006 or 2007. The school made AYP based on 2008 assessments; if it makes AYP again in 2009, it will exit improvement.
- ***Thurgood Marshall High School*** was created as a small learning community in 2003 when the district broke up a large neighborhood high school. The school has been in restructuring implementation since it opened because it inherited the NCLB improvement status of its "parent" high school. The school did not make AYP in 2006 or 2007. For its restructuring option, Thurgood Marshall chose the Blueprint for High School Reform and Derivative High Schools, an initiative intended to

² Includes Edison Schools located in Baltimore City.

divide large high schools into small learning communities. At the time this report went to press, the results of the 2008 High School Assessments had not been released.

In 2007-08, Baltimore made very few major changes to its strategies and supports for schools in restructuring, according to district officials. These strategies include quarterly benchmark exams linked to the Maryland School Assessment, instructional support teachers, subject matter coaches, after-school and weekend tutoring programs, support for data analysis, and new curricula. The Office of School Improvement continued to provide support to restructuring schools in developing and implementing their school improvement plans; school improvement coordinators continued to work with restructuring schools; and the Elementary Restructuring Area continued to provide assistance to restructuring elementary schools.

The supports provided to restructuring schools did not differ from those provided to all schools, said CEO Alonso, because all Baltimore City schools need intensive support and resources. He made this observation:

When I look at the district as a whole, I don't see these schools as belonging to a small margin. I think of these schools as belonging to a much broader band of schools that are caught in cycles of lack of success. So my strong feeling is that the systems that are going to support all the schools in the district will also help support these schools that are in final phases of restructuring.

Over the course of school year 2007-08, Alonso announced several substantial policy and program changes for Baltimore City, most of which are scheduled to take effect in the upcoming school year. Alonso introduced three major reform initiatives during his first year as CEO in Baltimore City:

- Creating six new “transformation schools” at the middle and high school levels in 2008-09; the plan is to open up to 18 such schools in subsequent years
- Decentralizing the school budget and funding process so that schools have site-based control over their expenditures
- Working with community-based organizations to engage parents at each school in evaluating the school and principal

The Baltimore City district made some minor changes and put in place a few additional programs or initiatives during school year 2007-08:

- The number of school improvement coordinators working out of the Office of School Improvement decreased from seven to six due to normal attrition and the CEO's decision to curtail hiring of new staff.
- The school improvement coordinators had the added responsibility of working with schools in restructuring planning to write restructuring plans.
- Restructuring middle schools were divided into small learning communities and given a range of additional resources, including intervention teachers who provided math and reading interventions to students and professional development to teachers.

Baltimore County Public Schools

In the Baltimore County Public Schools, just under half (49%) of the district's students are white, and 41% are African American. In addition, 40% are low-income. Of the district's 171 schools, 42 are Title I schools.

Based on 2007 state testing, the Baltimore County Public Schools met its AYP targets for the district as a whole, but several of its schools did not. In 2007-08, BCPS had 13 schools, including 7 Title I schools, in various stages of NCLB improvement. Three of these schools were in restructuring planning and one, Woodlawn Middle School, was in restructuring implementation in 2007-08. All four of these schools were located in the same administrative area, the southwest area of Baltimore County, within two miles of the Baltimore city limits. The populations served by these schools closely resembled those of many urban Baltimore schools. The three schools in restructuring planning were in the process of replacing school staff in 2007-08, while Woodlawn continued strategies begun in 2006-07.

Woodlawn Middle School made AYP based on 2008 assessments. If the school makes AYP again in 2009, it will exit improvement.

During the 2005-06 school year, Woodlawn Middle School began restructuring by replacing close to 20% of its staff. In 2006-07 Woodlawn implemented additional programs and initiatives as part of its restructuring effort, including the following:

- A college preparatory curriculum
- Increased collaboration time for teachers
- Action teams to monitor the school improvement plan
- Avenues for student feedback (Principal's Cabinet)
- A community task force
- A partnership with University of Maryland–Baltimore County to improve science, technology, engineering, and math education
- Systems to identify incoming 6th graders who need additional supports in reading or math

According to Brian Scriven, principal of Woodlawn Middle School, there were no changes of any significance in 2007-08 at the school. Rather, he said, the school hopes to raise achievement through its ongoing efforts:

We're moving forward with the plan that's in place. We're hoping that we will see the growth. We worked the plan with fidelity, made the adjustments to instruction as we've seen fit based on the short-cycle assessments and our benchmarks. So we're very optimistic that our students are going to show some significant growth.

Manuel Rodriguez, an area assistant superintendent, explained that in 2007-08, the Southwest Administrative Area office increased its monitoring of Woodlawn Middle School to ensure that the school was implementing its entire restructuring plan. This monitoring took the form of campus visits, during which staff from the area office met with teachers, observed instruction, and analyzed student data.

The school expected to make major changes in 2008-09. Brian Scriven was scheduled to leave Woodlawn Middle School and become principal of Woodlawn High School, which entered restructuring planning in

2007-08. The assistant principal at Woodlawn Middle School has been promoted to principal. Scriven's move is a part of the district's strategy for its three restructuring schools.

The three Baltimore County Schools in restructuring planning will be replacing substantial portions of their staff as their restructuring option, said Rodriguez. As it did in Woodlawn Middle School, the district began replacing staff in these schools in advance of NCLB requirements. At the time our interviews were conducted, all three principals in the restructuring planning schools had been replaced, and interviews for new teachers had begun in at least one school. In addition to replacing school staff, these schools have incorporated other strategies into their restructuring plans, Rodriguez said. For example, department chairs in core content areas and special education at these schools will move to a 12-month contract. These chairs will teach one class, mentor and model lessons for teachers in their department, monitor teachers, and work with the most challenging students, at the principal's discretion. In a small portion of schools, new teachers in some hard-to-fill positions will receive a signing bonus, and teachers will receive stipends to teach in after-school or Saturday programs.

Prince George's County Public Schools

The Prince George's County school system includes 208 schools, about a quarter of which are Title I schools. Three-fourths (75%) of the district's students are African American; 45% are eligible for free or reduced-price meals due to low family income.

As a district, the Prince George's County Public Schools failed to make AYP for the fifth consecutive year based on 2007 state testing and was identified by the state for corrective action. At the elementary level, the district missed AYP targets for English language learners in both reading and math. At the middle school level, the district fell short of AYP targets for students overall and for the Latino subgroup in reading, and for the subgroups of African American students, students with disabilities, low-income students, and English language learners in reading and math. At the high school level, only students with disabilities missed AYP targets in math.

In 2007-08, PGCPs had 31 schools, including 5 Title I schools, in the planning or implementation phase of restructuring. Nine of the schools in restructuring implementation were using a turnaround specialist as their restructuring option, and one school had chosen staff replacement as its option.

Two PGCPs schools exited restructuring implementation based on their 2007 test scores. While district officials acknowledged all of the hard work that the schools had done to make AYP, Chief Accountability Office Donna Muncey also noted that these schools had fewer subgroups “struggling to make AYP” than other PGCPs schools. Thus, the schools were able to focus resources and attention more fully on one or two subgroups.

Our study included four Prince George’s County schools:

- ***Arrowhead Elementary School*** entered restructuring implementation in 2007-08. While multiple subgroups had missed AYP targets in 2006, students with disabilities were the only subgroup that did not make AYP in reading or math in 2007. For its restructuring option, the school chose to replace staff, specifically all school staff members who were not highly qualified according to NCLB criteria. The school made AYP based on 2008 assessments; if it does so again in 2009, it will exit improvement.
- ***Bladensburg Elementary School*** made AYP in all areas in 2006, 2007, and 2008 testing and has exited improvement. The school had been using a turnaround specialist for its restructuring option.
- ***Charles Carroll Middle School*** entered restructuring implementation in 2004 and remained in that status for 2007-08 after multiple subgroups missed AYP targets. The school chose a turnaround specialist as its restructuring option. Based on 2008 testing, the school failed to make AYP for multiple subgroups. The school remains in restructuring.
- ***G. Garder Shugart Middle School*** has been in restructuring implementation since 2004 and has also used a turnaround specialist. Multiple subgroups have fallen short of AYP targets. Based on 2008 testing, the school failed to make AYP and remains in restructuring.

CHANGES IN DISTRICT STRATEGIES AND SUPPORTS FOR RESTRUCTURING SCHOOLS

Many PGCPs strategies and supports for schools in improvement remained the same in 2007-08 as in the previous year. For example, the district continued to provide extended learning opportunities for students in restructuring schools. Schools identified for improvement received district school improvement funds to provide after-school and Saturday learning opportunities for students. The district also continued to administer quarterly benchmarking assessments, aligned to the Maryland School Assessment, that are intended to be used to identify students who need more help. In addition, the PGCPs Department of School Improvement continued to coordinate the school improvement process for the district, assist schools with improvement planning, and assign school improvement resource teachers to all schools in improvement.

PGCPs did make some changes in its approach to working with restructuring schools, including many that are still in the planning stages. PGCPs launched a number of efforts that while not explicitly aimed at restructuring schools have impacted those schools:

- Each middle school is now assigned a data coach/school test coordinator to help school staff analyze and use their achievement data effectively.
- PGCPs received a \$17 million federal Teacher Incentive Fund grant that is earmarked for the district’s 42 lowest-performing schools, including those in restructuring implementation. Using these funds, PGCPs plans to support a pilot pay-for-performance initiative in 12 schools in 2008-09.
- PGCPs disbursed portions of its State School Improvement Grant directly to schools based on their individual proposals for building teacher instructional capacity. These grants averaged about \$60,000 per school.
- The Department of School Improvement, in conjunction with the Department of Curriculum and Instruction, conducted a separate, year-long professional development series for elementary 6th grade teachers, middle schools, and high schools in improvement.

- The district's Intensive Support and Intervention Schools program provides additional services to schools in improvement based on the school's student achievement or the number of subgroups falling short of AYP targets, rather than on the school's stage of NCLB improvement.
- Thirty-three PGCPs elementary and middle schools in improvement are implementing America's Choice, a comprehensive school reform model. This represents a major increase from the 17 schools that were piloting elements of the program in 2006-07. Most importantly, unlike 2006-07, when America's Choice was only partially implemented and began partway through the school year, in 2007-08 America's Choice was implemented fully at the beginning of the school year. Additionally, 16 high schools are piloting an America's Choice support model for students who did not pass the high school exit exam in algebra.

SUPPORTS SPECIFICALLY FOR RESTRUCTURING SCHOOLS

Schools in restructuring implementation received priority in hiring literacy and math coaches. While most district schools in restructuring planning or implementation found a literacy coach, few of these schools have a math coach due to a shortage of qualified math teachers.

PGCPs plans to add a new position, an alternative governance supervisor, to the Department of School Improvement for 2008-09. This person will coordinate the restructuring activities across the district's six regions and ensure that restructuring plans are implemented faithfully. Debra Mahone described the duties of these supervisors as follows:

He or she will serve as a troubleshooter to be sure that all of the needs of the schools are channeled to the appropriate offices and that any barriers or challenges that prevent them from replicating their proposal are taken care of. . . We want the person also to provide targeted professional development in the area of team building, developing a cohesive team to ensure that the plan is implemented as written. So we're hoping that position will again make the implementation process and the connection between the supervision, monitoring, evaluation, and support more real.

In addition, PGCPs has just hired a full-time data coach to work with the coordinating supervisor of alternative governance. The data coach will assist schools and will monitor the implementation of restructuring plans and the additional benchmark testing in some of the plans.

CONTINUED TWEAKING OF THE TURNAROUND SPECIALIST

In 2006-07, the Prince George's district made a high-profile attempt to transform the role of the turnaround specialist. In 2007-08, the district continued to fine-tune this restructuring strategy.

In 2007-08, all of the turnaround specialists were assigned to their schools well before the start of the school year, unlike the previous year when many schools were not assigned a specialist until winter or, in one case, spring. As a result, said Donna Muncey, school year 2007-08 "got off to a much calmer start."

The roles and responsibilities of the turnaround specialist did not change greatly in 2007-08, but the district did switch some assignments to try to achieve the best match between specialist and school. Donna Muncey explained this process:

We continue to assign and reassign the turnaround specialist to fit into the [school]—some of them are better with middle schools and some of them are better with elementary schools. And as we're seeing the kinds of strengths the turnaround specialists have, we've made some reassignments. So, for instance, we have one school where there's a longer-serving principal who's really struggling. We've put [a] retired principal from the school system into that school and replaced a different turnaround specialist who wasn't meeting the needs of that school.

REPLACING SCHOOL STAFF AT ARROWHEAD ELEMENTARY

After moving into restructuring implementation for 2007-08, Arrowhead Elementary School replaced nine teachers who did not meet the NCLB definition of "highly qualified." As a result, 30% of the staff that year was new. In addition, the school began implementing the Comer process, a schoolwide reform approach developed by Dr. James Comer, as part of its restructuring

ing strategy. Arrowhead also implemented a co-teaching model to support students with special needs.

Teachers at Arrowhead participated in a great deal of staff development during 2007-08 as a part of the restructuring plan. Staff development included a retreat at the beginning of the school year to jump-start the implementation of Comer, ongoing support for teachers who work with special education students, and professional development associated with the school's participation in the federal Reading First program.

Doug Anthony, principal at Arrowhead, was open about the growing pains associated with making changes at the school. Still, he remained optimistic:

Have we had our bumps and bruises? Absolutely. The whole year was a learning process . . . it absolutely is 100 percent challenging. But I think we're better for it now, and we'll definitely learn from the mistakes that we've made this year to improve for next year.

Anthony commented that the district had been "100% supportive" of the school and provided whatever assistance he needed to implement the restructuring plan. He also said that he knows his school is a model for the 21 schools in restructuring planning this year and that the district is closely watching Arrowhead's progress to learn from his experiences.

Credits and Acknowledgments

This report was written by Brenda Neuman-Sheldon, CEP consultant, with assistance from Caitlin Scott, CEP consultant. Nancy Kober, CEP consultant, edited the report. Jack Jennings, CEP's president and CEO, and Diane Stark Rentner, CEP's director of national programs, provided advice and assistance.

We are grateful to the Bill and Melinda Gates Foundation, which supports this project, and the George Gund Foundation, the John D. and Catherine T. MacArthur Foundation, and the Phi Delta Kappa International Foundation, which provide general resources to the Center. The statements made and the views expressed in this report are solely the responsibility of the Center on Education Policy.

Based in Washington, D.C. and founded by Jack Jennings in January 1995, the Center on Education Policy is a national, independent advocate for public education and for more effective public schools. The Center works to help Americans better understand the role of public education in a democracy and the need to improve the academic quality of public schools. The Center does not represent any special interests. Instead the Center helps citizens make sense of the conflicting opinions and perceptions about public education and create conditions that will lead to better public schools.



Center on Education Policy

1001 Connecticut Avenue, NW, Suite 522

Washington, D.C. 20036

tel: 202.822.8065

fax: 202.822.6008

e: cep-dc@cep-dc.org

w: www.cep-dc.org