

**U.S. Department of Education - EDCAPS
G5-Technical Review Form (New)**

Status: Submitted

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Technical Review Coversheet

Applicant: Education, Maine Department Of (S425B200039)

Reader #1: *****

	Points Possible	Points Scored
Questions		
Selection Criteria		
Highest Coronavirus Burden		
1. Coronavirus Burden	20	20
Quality of Project Services and Project Plan		
1. Project Services/Plan	35	28
Quality of Management Plan / Adequacy of Resources		
1. Management Plan/Resources	25	20
Sub Total	80	68
Total	80	68

Technical Review Form

Panel #7 - FY20 REM - 7: 84.425B

Reader #1: *****

Applicant: Education, Maine Department Of (S425B200039)

Questions

Selection Criteria - Highest Coronavirus Burden

1. A: Highest Coronavirus Burden (up to 20 Points)

(2) The extent to which the applicant has a high coronavirus burden based on indicators and information factors identified by the applicant in response to Application Requirement 3. (up to 20 points)

Strengths:

The general COVID-19 pandemic has increased the existing inequities and challenges of the state and illustrate the state's high coronavirus burden supported the following data points and research conducted by the Maine Department of Education.

- Limited or no access to the internet impacted K-12 students during Covid-19 with more than 20% of the students affected by lack of access to the school services. P1
- Majority of teachers were not prepared to deliver instruction remotely and 94% of teachers indicated that children would experience a "worse" or "much worse" learning outcomes because of remote instruction. P2
- Educational efforts prioritized providing basic needs to every child, closing the gap in internet connectivity, and increasing teacher professional development. P4
- Providing every community in Maine with access to a food service site, Maine served 2.1 million meals to children in April. P5

Weaknesses:

There are no weaknesses noted.

Reader's Score: 20

Selection Criteria - Quality of Project Services and Project Plan

1. B: Quality of Project Services and Project Plan (up to 35 points)

The Secretary considers the quality of project services and project plan.

In determining the quality of the project services and project plan, the Secretary considers the quality and sufficiency of strategies for ensuring equal access and treatment for eligible project participants who are members of groups that have traditionally been underrepresented based on race, color, national origin, gender, age, or disability. (up to 5 points)

In addition, the Secretary considers--

(1) The extent to which the proposed project is an exceptional approach to absolute priority

being addressed and includes a detailed project plan for addressing the absolute priority. (up to 10 points)

(2) The extent to which specific gaps or weaknesses in services, infrastructure, or opportunities have been identified and will be addressed by the proposed project to respond to the needs of students. (up to 10 points)

(3) The likelihood that the services to be provided by the proposed project will expand access to remote learning options and lead to improvements in student outcomes. (up to 5 points)

(4) The extent to which the services to be provided by the proposed project reflect up-to-date knowledge from research and effective practice. (up to 5 points)

Strengths:

The Covid-19 virus disrupted the state's education system forcing a creation of "emergency style" remote learning and resulting in unevenly successful experiences for students. Under-represented students, students of color, students with disabilities, and disadvantaged students, report particularly poor experiences and outcomes during the this emergency provision of remote education. Maine's proposal, Rethinking Remote Education Venture (RREV) offers a multi-pronged solution with the primary goal of generating innovative remote learning models to provide equitable access to high quality educational experiences for all students. P8-9

(1) A multi-pronged approach for the development of objectives and project outlines for developing the RREV builds strong relationships to its key stakeholders and helps the effective implementation of these key projects by providing grants to foster the design of remote learning prototype models to be field tested, revised, and honed by schools willing to pilot these models. P12-20

(1) By defining the four key activities and the design concepts. Guidance is provided to ensure implementation is taking place with students, families, and teachers. Student needs are supported and fully promote the engagement in all areas of the RREV four key activities. The proposal provides the necessary infrastructures and opportunities, through professional development, coursework, and guided engagement. P11

(1) Use of best practice research for the field-initiated models fosters innovation based on evidence-based learning strategies, knowledge sharing, and continuous improvement which may increase student outcomes. Fostering the effective use of design processes to empower educators and school leaders through the use authentic research studies and teacher development professionals (University of Maine, Maine Community Colleges) to partner with. P12

(1) Use of the method and practice of Universal Design for Learning (UDL) highlights an exceptional approach as the UDL model for design of strategies can meet all students needs and increases access and equity by student to the key activities. P17

(2) The need to build capacity in school leaders and educators is addressed by partnering with the University of Maine; Maine Community College System; and business and research and development organizations who will offer professional development and training to educators and school leaders. This high level training to develop teacher capacity and allowing diverse entry point for access to training can build effectiveness and engagement by the participants. P13

(3) The project will create a culture of collaboration is created by the knowledge sharing across multiple design concepts; Adopter Schools, Education Engineers, and EnGINE. Innovation and continuous improvement of design concepts which could increase the likelihood of expanding remote learning to more students. Providing educators with a menu of professional development opportunities stimulates innovation, an example is the Education Engineering workshops. P19

(3) The development of the partnership plan with MADSEC and other organizations who provide high access services at a state-wide level supports an ability to increase student outcomes. P19

(4) Research used to develop plan integrates research and best practices from current educational and industry professionals as cited in the narrative, including aligning project approach with DBIR. P12

(4) Inclusion of performance measures for RREV aligns with effective practices. P21

Weaknesses:

(1) The project plan's performance measures for development of new models lack the specific process for gathering and analyzing data from all of the stakeholders, educational professionals, and communities. The project plan's lack of detail on this portion of the plan may lead the projects to be limited in their ability to be robustly deployed to all the state's students. This may lead to not meeting student learning outcomes, stakeholder needs, and instructor satisfaction may decline. P21

(1)The state's project plan does not describe a process or system to ensure state-wide access by special populations or providing second language learner supports to ensure technology access is equitable to all Maine students. This lack of a specific plan could decrease the likelihood of all students being able to participate in the high quality remote learning options being developed. P20

(2)Gaps and specific solutions to special student population needs are not discussed and may indicate a lack of understanding of how to respond and address student needs and could causes some students to not engage in the project. P20

(2)The proposed enhanced remote learning opportunities for students can be limited without a specific approach to developing equal technology access for student populations. An example is students with language needs could need additional supports to ensure they are served by projects being developed. P19

(3)The project's aggressive timelines (short time-frame to accomplish goal) can hinder the likelihood that the proposed remote learning options are expanded across the state. This could demonstrate a possible limit to expansion and decrease the opportunity engage all stakeholders. P24-25

Reader's Score: 28

Selection Criteria - Quality of Management Plan / Adequacy of Resources**1. C: Quality of the Management Plan and Adequacy of Resources (up to 25 points)**

In determining the quality of the management plan and adequacy of resources, the Secretary considers--

- (1) The adequacy of the management plan to achieve the objectives of the proposed project on time and within budget, including clearly defined responsibilities, timelines, and milestones for accomplishing project tasks. (up to 5 points)**
- (2) The extent to which the proposed use of funds will adequately support the proposed project. (up to 5 points)**
- (3) The extent to which the costs are reasonable in relation to the objectives, design, and potential significance of the proposed project. (up to 5 points)**
- (4) The extent to which the costs are reasonable in relation to the number of persons to be served and to the anticipated results and benefits. (up to 10 points)**

Strengths:

(1)The RREV project is adequately supported by the funds purposed in this project. Budget narrative P1.

(1) Office Innovation to oversee as dedicated manager of RREV. Budget narrative P1

(2) By establishing partnerships with the state's institution of higher learning and other like-minded organizations funds can be leveraged to increase services and engage more educators in adopting the RREV mind-set. Budget narrative P4

(3) The development of a statewide network that can be used to inspire change on a regional and even local level puts the costs in a reasonable relationship to design and potential impact of the project. Budget narrative P4

(4)The number of persons served by the project are aligned to the estimate impact on innovative remote learning models, teacher sharing of new ideas, and school leaders engineer new approaches to education. As purposed the project has the potential to impact tens of thousands of students in a positive way. P23-25

(4)The applicant is estimating a direct benefit to more than 15,000 educators who will receive training in the design process or will contribute to the design or beta-testing of innovative new models. The scope of their project will target schools across our state, impacting more than 200,000 students which has the is supported by the cost projections in the plan and can meet the anticipated results for student outcomes.

Weaknesses:

(2)The management plan is limited in detail descriptions of staffing and estimated time commitments by position and does not clearly illustrate in detail the design project tasks with timelines and expected completion dates.P23-25

(4)There is no data or qualitative evidence to show how project costs and design are aligned to the state's vision to fundamentally change the educational mindset of the state. P23

Reader's Score: 20

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Technical Review Coversheet

Applicant: Education, Maine Department Of (S425B200039)

Reader #2: *****

	Points Possible	Points Scored
Questions		
Selection Criteria		
Highest Coronavirus Burden		
1. Coronavirus Burden	20	20
Quality of Project Services and Project Plan		
1. Project Services/Plan	35	27
Quality of Management Plan / Adequacy of Resources		
1. Management Plan/Resources	25	23
Sub Total	80	70
Total	80	70

Technical Review Form

Panel #7 - FY20 REM - 7: 84.425B

Reader #2: *****

Applicant: Education, Maine Department Of (S425B200039)

Questions

Selection Criteria - Highest Coronavirus Burden

1. A: Highest Coronavirus Burden (up to 20 Points)

(2) The extent to which the applicant has a high coronavirus burden based on indicators and information factors identified by the applicant in response to Application Requirement 3. (up to 20 points)

Strengths:

The applicant identifies the burden of COVID-19 indicating that according to the Maine Department of Education, more than 25,000 Maine students found themselves abruptly cut off from their educational settings, teachers, peers, and support services due to a lack of internet connectivity. Moreover, Maine has seen an increase in mental health crisis calls by 57 percent to the intentional warm line and increases for mental health related inquiries into the general 211 information line since March 13, 2020. The applicant further notes that in a survey of 1400 teachers, 66 percent reported that they lacked training and/or resources for providing remote instruction (compared with 53 percent nationally), and 21 percent of Maine teachers reported a lack of internet access from home) (e16-17). Additionally, between 45 percent and 64 percent of Maine students (depending upon grade level) found remote learning to be "overwhelming" as further evidenced by 70 percent of parents/guardians who responded to a Maine Parents Federation survey reported concerns about academic and social regression. Maine's Education Association asserts that COVID-19 negatively impacted more than half of Maine's learning community. Moreover, the state leads the nation in racial disparity with respect to COVID-19 cases; Black Mainers make up 27.7 percent of Maine's COVID-19 cases even though these residents represent just 1.4 percent of the total population (e17).

Weaknesses:

No weaknesses noted.

Reader's Score: 20

Selection Criteria - Quality of Project Services and Project Plan

1. B: Quality of Project Services and Project Plan (up to 35 points)

The Secretary considers the quality of project services and project plan.

In determining the quality of the project services and project plan, the Secretary considers the quality and sufficiency of strategies for ensuring equal access and treatment for eligible project participants who are members of groups that have traditionally been underrepresented based on race, color, national origin, gender, age, or disability. (up to 5 points)

In addition, the Secretary considers--

(1) The extent to which the proposed project is an exceptional approach to absolute priority

being addressed and includes a detailed project plan for addressing the absolute priority. (up to 10 points)

(2) The extent to which specific gaps or weaknesses in services, infrastructure, or opportunities have been identified and will be addressed by the proposed project to respond to the needs of students. (up to 10 points)

(3) The likelihood that the services to be provided by the proposed project will expand access to remote learning options and lead to improvements in student outcomes. (up to 5 points)

(4) The extent to which the services to be provided by the proposed project reflect up-to-date knowledge from research and effective practice. (up to 5 points)

Strengths:

SUB 1: The applicant clearly addresses extent to which the proposed project is an exceptional approach to absolute priority being addressed and includes a detailed project plan for addressing the absolute priority. For example, they employed a variety of data sources (surveys, student data systems, and school finance data) to design the proposed project (e-25-26). Using these data points, the applicant identified the top priorities within the target population. The applicant noted the data points indicated the target population needed an online learning platform for anywhere/anytime learning as well as a need to examine and improve systems. The applicant has also issued a public statement of commitment to better support all students and families that are defined by the goals and objectives of the proposed project.

SUB 2: The applicant asserts varying data collection points were employed to identify the gaps in services. Those collection methods include surveys, student data systems, and their school finance data system (e18-19). Gaps in services include students having a lack of healthy nutrition; geographical and socioeconomic challenges for students, as well as students having secure internet access and devices to facilitate at home learning (e20-21). Furthermore, the applicant states the Maine Department of Education sent out multiple surveys and reached out directly to schools and districts with known underrepresented and under-resourced student groups to ensure equitable access to this opportunity resulting in providing connectivity for 21,845 Maine students.

SUB 3: The applicant also notes that Maine Department of Education staff provides Elementary and Secondary School Emergency Relief (ESSER) office hours each week for district programs and fiscal leads. Maine Department of Education has received and approved 31 SAU applications so far. The applicant further contends that Maine Department of Education in concert with the Maine educational community organizations (museums, science centers, libraries) and Maine educators will create a library of asynchronous learning modules aligned to the Maine Learning Results (e22-23). These modules feature collaborative, interdisciplinary, project-based learning activities to ensure an enriched and meaningful remote learning experience for students and educators who use this option for K-12. The applicant provides a timeline delineating proposed objectives, responsible party, start/end dates, and prospective outcomes (e38-40).

SUB 4: The applicant thoroughly describes the extent to which the services to be provided by the proposed project reflect up-to-date knowledge from research and effective practice. The applicant proposes to employ the Theory of Change as the guiding theoretical principal for their Redesigning Remote Education Venture. The applicant's approach also aligns with the principles of Design-Based Implementation Research which includes professional development in design and innovation; outdoor education, multiple & flexible pathways, extended learning opportunities, and online learning. The proposed design ensures inclusion of all students and youth (e27-e28). The overarching goal of the proposed model is to create a culture of innovation statewide to meet the fast-changing needs of remote learners in an unpredictable, globalized world by offering six Education Engineering Workshop and training more of Maine's educators in the design and innovation processes. Subsequently the applicant proposes to lead promote field-initiated remote learning model that will incorporate evidence-based strategies vis a vis effective practices (e29-e30).

Weaknesses:

The applicant does not provide strategies to provide equal access for the target population. For example, the applicant does not provide strategies to address equal access to serve underserved students.

SUB 2: The applicant does not address the gap of broadband access or the need to provide support to parents.

Reader's Score: 27

Selection Criteria - Quality of Management Plan / Adequacy of Resources**1. C: Quality of the Management Plan and Adequacy of Resources (up to 25 points)**

In determining the quality of the management plan and adequacy of resources, the Secretary considers--

- (1) The adequacy of the management plan to achieve the objectives of the proposed project on time and within budget, including clearly defined responsibilities, timelines, and milestones for accomplishing project tasks. (up to 5 points)**
- (2) The extent to which the proposed use of funds will adequately support the proposed project. (up to 5 points)**
- (3) The extent to which the costs are reasonable in relation to the objectives, design, and potential significance of the proposed project. (up to 5 points)**
- (4) The extent to which the costs are reasonable in relation to the number of persons to be served and to the anticipated results and benefits. (up to 10 points)**

Strengths:

SUB 1: The applicant clearly describes the adequacy of the management plan to achieve the objectives of the proposed project on time and within budget, including clearly defined responsibilities, timelines, and milestones for accomplishing project tasks. The Office of Innovation team will manage RREV's initial setup and implementation until the hiring process is complete. Project Director who will manage day-to-day operations of the grant, a full-time support staff person to assist with documentation and reporting of grant activities, and an experienced and innovative team to develop EnGiNE (e37). The applicant proposes to establish partnerships with institutions of higher education and other stakeholders related to higher education to develop relationships with like-minded organization to design, coordinate, and run professional development opportunities, workshops, and symposiums to ensure that milestones are met within the scope and timeframe of the proposed project.

SUB 2:) The applicant comprehensively illustrates the extent to which the proposed use of funds will adequately support the proposed project. For example, the applicant describes the personnel, travel, and equipment expenditures that are germane to the proposed project (attachment). Specifically, the applicant provides a budget breakdown denoting the proposed expenditures. The applicant notes that a total of 30 grant proposal will be offered to schools piloting the innovative models, resulting in four rolling grant cycles (Jan-Jan and April-April 2021 and 2022). The average grant is estimated at [REDACTED] with an estimate of 9 per cycle. A total of [REDACTED] is planned to directly support the districts and help cover costs associated with implementing a variety of innovative models including staff, supplies, materials and other related expenses that meet all grant requirements.

SUB 3: The applicant thoroughly denotes the extent to which the costs are reasonable in relation to the objectives, design, and potential significance of the proposed project. The proposed expenditures will facilitate the design, development, and field-testing of novel remote learning models accessible to all educators and can dramatically transform the provision of remote instruction for educators in their state and, ultimately, for the nation as a whole (e38).

SUB 4: The applicant distinctly explains extent to which the costs are reasonable in relation to the number of persons to be served and to the anticipated results and benefits. The applicant estimates a direct benefit to more than 15,000 educators who will receive training in the design process or will contribute to the design or beta-testing of innovative new models. Specifically, the anticipated results for 200,000 students include: equitable access to flexible high quality remote learning options, improved educational outcomes, increased voice and choice in their educational trajectories; and protection from the possibility of ongoing disruptions, depending upon the coronavirus pandemic or other emergency situations (e38).

Weaknesses:

SUB 1. The timeline does not clearly illustrate how the project tasks will be reached. The timeline presents an unrealistic timeframe for awarding subgrants (e38-39). For example, the applicant does not provide benchmark data to ascertain the interim milestones to successfully accomplish project tasks.

Reader's Score: 23

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Technical Review Coversheet

Applicant: Education, Maine Department Of (S425B200039)

Reader #3: *****

	Points Possible	Points Scored
Questions		
Selection Criteria		
Highest Coronavirus Burden		
1. Coronavirus Burden	20	20
Quality of Project Services and Project Plan		
1. Project Services/Plan	35	28
Quality of Management Plan / Adequacy of Resources		
1. Management Plan/Resources	25	21
Sub Total	80	69
Total	80	69

Technical Review Form

Panel #7 - FY20 REM - 7: 84.425B

Reader #3: *****

Applicant: Education, Maine Department Of (S425B200039)

Questions

Selection Criteria - Highest Coronavirus Burden

1. A: Highest Coronavirus Burden (up to 20 Points)

(2) The extent to which the applicant has a high coronavirus burden based on indicators and information factors identified by the applicant in response to Application Requirement 3. (up to 20 points)

Strengths:

The applicant provides a compelling narrative that describes (1) the lack of broadband access in rural areas (approximately 20% of K-12 students); (2) existing high rates of drug use, suicide, mental illness, and domestic violence; and (3) a major loss of revenue for tourism, leading to future budget shortfalls (e16-e19).

The applicant also describes the impact of coronavirus on teaching students with disabilities. School administrators have significant concerns with providing special education and related services as described in the child's Individualized Education Plan (IEP). In addition, children of color are disproportionately affected by coronavirus and the K-12 effects of coronavirus (e17).

Weaknesses:

No weaknesses noted.

Reader's Score: 20

Selection Criteria - Quality of Project Services and Project Plan

1. B: Quality of Project Services and Project Plan (up to 35 points)

The Secretary considers the quality of project services and project plan.

In determining the quality of the project services and project plan, the Secretary considers the quality and sufficiency of strategies for ensuring equal access and treatment for eligible project participants who are members of groups that have traditionally been underrepresented based on race, color, national origin, gender, age, or disability. (up to 5 points)

In addition, the Secretary considers--

(1) The extent to which the proposed project is an exceptional approach to absolute priority being addressed and includes a detailed project plan for addressing the absolute priority. (up to 10 points)

(2) The extent to which specific gaps or weaknesses in services, infrastructure, or opportunities have been identified and will be addressed by the proposed project to respond to the needs of students. (up to 10 points)

(3) The likelihood that the services to be provided by the proposed project will expand access to remote learning options and lead to improvements in student outcomes. (up to 5 points)

(4) The extent to which the services to be provided by the proposed project reflect up-to-date knowledge from research and effective practice. (up to 5 points)

Strengths:

Equal Access: The applicant recognizes that inequities experienced by students who are members of groups that have been traditionally underrepresented must be highlighted and improved (e24). The applicant issued a “public statement of commitment to affirm our intentions and our plans to make sweeping changes to better support all students and families” (e25).

(1) The proposed project is an exceptional approach to addressing Absolute Priority 3. The new project is called Rethinking Remote Education Venture (RREV). The applicant proposes to change the mindset and role of a teacher so that they can successfully support students with agile, effective and resilient learning experiences (e26). The logic model describes needs/gaps, resources/inputs, key activities, outputs, and long-term outcomes in a linear way that provides evidence of a well-developed plan (e25). The applicant also notes that the project is already underway with other resources and that RREV would be a continuation building on past work (e23).

(2) The applicant identifies weaknesses in broadband access and providing families with effective support and mentorship (e24).

(3) The applicant provides evidence that RREV is likely to expand access to remote learning options. RREV proposes innovative Education Model Categories: (1) outdoor education, (2) multiple and flexible pathways, (3) extended learning opportunities, (4) online learning, and (5) yet-imagined (e29-e31). The applicant also proposes ambitious, but attainable, goals for the project. RREV outcomes will be measured by performance measures, such as number of students served, parent satisfaction, number of new remote learning models brought to the field-testing stage, etc. (e36).

(4) The applicant cites relevant research on the education model categories (see footnotes e30-e31).

The also applicant proposes to use the Universal Design for Learning (UDL) Framework to support equity and equal access to the curriculum for students with disabilities (e31-e32). UDL is currently used in designing other large instructional standards and assessments. It is an evidence-based framework that helps students with disabilities demonstrate what they know and can do.

Weaknesses:

Equal Access: The applicant states that it is “committed to addressing these inequities through the project described in this application to make high-quality remote learning accessible for all Mainers” (e17); and that “persistent evidence of inequity stands as one of the major concerns facing our state and our education system” (e24). The applicant does not, however, discuss strategies that ensure equal access for participants who are members of groups that have traditionally been underrepresented based on race, color, national origin, gender, age, or disability.

(1) No weaknesses noted.

(2) The applicant does not describe how the project specifically addresses the gaps/weaknesses that were noted (broadband access and providing families with effective support and mentorship; e24). All of RREV’s goals seem to be increasing professional development, online offerings, parent satisfaction, student satisfaction, etc., but there is no discussion about how RREV addresses broadband access or providing support for families directly.

(4) No weaknesses noted.

Selection Criteria - Quality of Management Plan / Adequacy of Resources

1. C: Quality of the Management Plan and Adequacy of Resources (up to 25 points)

In determining the quality of the management plan and adequacy of resources, the Secretary considers--

- (1) The adequacy of the management plan to achieve the objectives of the proposed project on time and within budget, including clearly defined responsibilities, timelines, and milestones for accomplishing project tasks. (up to 5 points)
- (2) The extent to which the proposed use of funds will adequately support the proposed project. (up to 5 points)
- (3) The extent to which the costs are reasonable in relation to the objectives, design, and potential significance of the proposed project. (up to 5 points)
- (4) The extent to which the costs are reasonable in relation to the number of persons to be served and to the anticipated results and benefits. (up to 10 points)

Strengths:

- (1) The applicant provides an adequate management plan to achieve the objectives of the proposed project, including clearly defined timelines and milestones (e38-e40).
- (2) The budget narrative provides details on the costs necessary for the RREV project. Details are provided on personnel, fringe benefits, travel (limited), equipment, supplies, contractual agreements, and other expenses (see budget narrative attachment). Proposed salaries seem reasonable relative to the expected education and level of expertise of the personnel. Similarly, the proposed contracting rate seems in-line with industry standards.
- (3) The costs appear reasonable in relation to the objectives, design, and potential significance of the proposed project. The objective of developing a statewide network of education “engineers” (e38) may have a significant impact on education because these individuals will be trained to think about education models in an iterative way. The iterative/continuous improvement process may lead to improvements in education during this project period and may continue after the project period.
- (4) Costs appear reasonable in relation to the number of persons to be served and the anticipated results and benefits. Up to 15,000 educators may receive training in the design process of RREV or participate in beta-testing of new models. The project may affect more than 200,000 students, and project activities may improve equitable access to remote learning outcomes, increased choice, and protection from the possibility of ongoing disruptions (e38). The RREV has the opportunity to redefine the role of the teacher – developing and using a different skill set, including research, design, and entrepreneurship. It also has the opportunity to create a more seamless education for students in the state.

Weaknesses:

- (1) Some of the management timeline and milestones seem either too ambitious or too vague. For example, the timeline for drafting and publishing an RFP and awarding and executing a contract seems ambitious. When hiring an independent evaluator, the RFP will be drafted and published by 9/13/2020; the awarding and executing of the contract will happen between 9/14/2020 and 9/30/2020. That would be an exceptionally quick turnaround time for holding a competition for a contract. Also, some of the timeline is vague. For example, the independent evaluator will create and implement an evaluation plan between 10/9/2020 and 7/31/2023. While it makes sense that evaluation will be ongoing, this milestone is a bit broad and it is unclear which elements of the evaluation will be accomplished at what time. (e39)

(2) No weaknesses noted.

(3) No weaknesses noted.

(4) No weaknesses noted.

Reader's Score: 21

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