
ESEA Flexibility

Request for Window 3

Puerto Rico Department of Education



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INTRODUCTION

The U.S. Department of Education (Department) is offering each State educational agency (SEA) the opportunity to request flexibility on behalf of itself, its local educational agencies (LEAs), and its schools, in order to better focus on improving student learning and increasing the quality of instruction. This voluntary opportunity will provide educators and State and local leaders with flexibility regarding specific requirements of the No Child Left Behind Act of 2001 (NCLB) in exchange for rigorous and comprehensive State-developed plans designed to improve educational outcomes for all students, close achievement gaps, increase equity, and improve the quality of instruction. This flexibility is intended to build on and support the significant State and local reform efforts already underway in critical areas such as transitioning to college- and career-ready standards and assessments; developing systems of differentiated recognition, accountability, and support; and evaluating and supporting teacher and principal effectiveness.

The Department invites interested SEAs to request this flexibility pursuant to the authority in section 9401 of the Elementary and Secondary Education Act of 1965 (ESEA), which allows the Secretary to

waive, with certain exceptions, any statutory or regulatory requirement of the ESEA for an SEA that receives funds under a program authorized by the ESEA and requests a waiver. Under this flexibility, the Department would grant waivers through the 2014–2015 school year.

Review and Evaluation of Requests

The Department will use a review process that will include both external peer reviewers and staff reviewers to evaluate SEA requests for this flexibility. This review process will help ensure that each request for this flexibility approved by the Department is consistent with the principles described in the document titled *ESEA Flexibility*, which are designed to support State efforts to improve student academic achievement and increase the quality of instruction, and is both educationally and technically sound. Reviewers will evaluate whether and how each request for this flexibility will support a comprehensive and coherent set of improvements in the areas of standards and assessments, accountability, and teacher and principal effectiveness that will lead to improved student outcomes. Each SEA will have an opportunity, if necessary, to clarify its plans for peer and staff reviewers and to answer any questions reviewers may have. The peer reviewers will then provide comments to the Department. Taking those comments into consideration, the Secretary will make a decision regarding each SEA's request for this flexibility. If an SEA's request for this flexibility is not granted, reviewers and the Department will provide feedback to the SEA about the components of the SEA's request that need additional development in order for the request to be approved.

GENERAL INSTRUCTIONS

An SEA seeking approval to implement this flexibility must submit a high-quality request that addresses all aspects of the principles and waivers and, in each place where a plan is required, includes a high-quality plan. Consistent with ESEA section 9401(d)(1), the Secretary intends to grant waivers that are included in this flexibility through the end of the 2014–2015 school year for SEAs that request the flexibility in “Window 3” (*i.e.*, the September 2012 submission window for peer review in October 2012). The Department is asking SEAs to submit requests that include plans through the 2014–2015 school year in order to provide a complete picture of the SEA's reform efforts. The Department will not accept a request that meets only some of the principles of this flexibility.

This *ESEA Flexibility Request for Window 3* is intended for use by SEAs requesting ESEA flexibility in September 2012 for peer review in October 2012. The timelines incorporated into this request reflect the timelines for the waivers, key principles, and action items of ESEA flexibility for an SEA that is requesting flexibility in this third window.

High-Quality Request: A high-quality request for this flexibility is one that is comprehensive and coherent in its approach, and that clearly indicates how this flexibility will help an SEA and its LEAs improve student achievement and the quality of instruction for students.

A high-quality request will (1) if an SEA has already met a principle, provide a description of how it has done so, including evidence as required; and (2) if an SEA has not yet met a principle, describe how it will meet the principle on the required timelines, including any progress to date. For example, an SEA that has not adopted minimum guidelines for local teacher and principal evaluation and support systems consistent with Principle 3 by the time it submits its request for the flexibility will need to provide a plan demonstrating that it will do so by the end of the 2012–2013 school year. In each such case, an SEA's

plan must include, at a minimum, the following elements for each principle that the SEA has not yet met:

1. **Key milestones and activities:** Significant milestones to be achieved in order to meet a given principle, and essential activities to be accomplished in order to reach the key milestones. The SEA should also include any essential activities that have already been completed or key milestones that have already been reached so that reviewers can understand the context for and fully evaluate the SEA's plan to meet a given principle.
2. **Detailed timeline:** A specific schedule setting forth the dates on which key activities will begin and be completed and milestones will be achieved so that the SEA can meet the principle by the required date.
3. **Party or parties responsible:** Identification of the SEA staff (*e.g.*, position, title, or office) and, as appropriate, others who will be responsible for ensuring that each key activity is accomplished.
4. **Evidence:** Where required, documentation to support the plan and demonstrate the SEA's progress in implementing the plan. This *ESEA Flexibility Request for Window 3* indicates the specific evidence that the SEA must either include in its request or provide at a future reporting date.
5. **Resources:** Resources necessary to complete the key activities, including staff time and additional funding.
6. **Significant obstacles:** Any major obstacles that may hinder completion of key milestones and activities (*e.g.*, State laws that need to be changed) and a plan to overcome them.

Included on page 19 of this document is an example of a format for a table that an SEA may use to submit a plan that is required for any principle of this flexibility that the SEA has not already met. An SEA that elects to use this format may also supplement the table with text that provides an overview of the plan.

An SEA should keep in mind the required timelines for meeting each principle and develop credible plans that allow for completion of the activities necessary to meet each principle. Although the plan for each principle will reflect that particular principle, as discussed above, an SEA should look across all plans to make sure that it puts forward a comprehensive and coherent request for this flexibility.

Preparing the Request: To prepare a high-quality request, it is extremely important that an SEA refer to all of the provided resources, including the document titled *ESEA Flexibility*, which includes the principles, definitions, and timelines; the document titled *ESEA Flexibility Review Guidance for Window 3*, which includes the criteria that will be used by the peer reviewers to determine if the request meets the principles of this flexibility; and the document titled *ESEA Flexibility Frequently Asked Questions*, which provides additional guidance for SEAs in preparing their requests.

As used in this request form, the following terms have the definitions set forth in the document titled *ESEA Flexibility*: (1) college- and career-ready standards, (2) focus school, (3) high-quality assessment, (4) priority school, (5) reward school, (6) standards that are common to a significant number of States, (7) State network of institutions of higher education, (8) student growth, and (9) turnaround principles.

Each request must include:

- A table of contents and a list of attachments, using the forms on pages 1 and 2.
- The cover sheet (p. 3), waivers requested (p. 4-6), and assurances (p. 7-8).
- A description of how the SEA has met the consultation requirements (p. 9).
- Evidence and plans to meet the principles (p. 10-18). An SEA will enter narrative text in the text boxes provided, complete the required tables, and provide other required evidence. An SEA may supplement the narrative text in a text box with attachments, which will be included in an appendix. Any supplemental attachments that are included in an appendix must be referenced in the related narrative text.

Requests should not include personally identifiable information.

Process for Submitting the Request: An SEA must submit a request to the Department to receive the flexibility. This request form and other pertinent documents are available on the Department's Web site at: <http://www.ed.gov/esea/flexibility>.

Electronic Submission: The Department strongly prefers to receive an SEA's request for the flexibility electronically. The SEA should submit it to the following address:
ESEAflexibility@ed.gov.

Paper Submission: In the alternative, an SEA may submit the original and two copies of its request for the flexibility to the following address:

Paul S. Brown, Acting Director
Student Achievement and School Accountability Programs
U.S. Department of Education
400 Maryland Avenue, SW, Room 3W320
Washington, DC 20202-6132

Due to potential delays in processing mail sent through the U.S. Postal Service, SEAs are encouraged to use alternate carriers for paper submissions.

Request Submission Deadline

The submission due date for Window 3 is September 6, 2012.

Technical Assistance for SEAs

The Department has conducted a number of webinars to assist SEAs in preparing their requests and to respond to questions. Please visit the Department's Web site at: <http://www.ed.gov/esea/flexibility> for copies of previously conducted webinars and information on upcoming webinars.

For Further Information

If you have any questions, please contact the Department by e-mail at ESEAflexibility@ed.gov.

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COVER SHEET FOR ESEA FLEXIBILITY REQUEST

<p>Legal Name of Requester: Click here to enter text.</p>	<p>Requester’s Mailing Address: Click here to enter text.</p>
<p>State Contact for the ESEA Flexibility Request</p> <p>Name: Click here to enter text.</p> <p>Position and Office: Click here to enter text.</p> <p>Contact’s Mailing Address: Click here to enter text.</p> <p>Telephone: Click here to enter text.</p> <p>Fax: Click here to enter text.</p> <p>Email address: Click here to enter text.</p>	
<p>Chief State School Officer (Printed Name): Click here to enter text.</p>	<p>Telephone: Click here to enter text.</p>
<p>Signature of the Chief State School Officer: X_____</p>	<p>Date: Click here to enter text.</p>
<p>The State, through its authorized representative, agrees to meet all principles of the ESEA Flexibility.</p>	

WAIVERS

By submitting this flexibility request, the SEA requests flexibility through waivers of the ten ESEA requirements listed below and their associated regulatory, administrative, and reporting requirements by checking each of the boxes below. The provisions below represent the general areas of flexibility requested; a chart appended to the document titled *ESEA Flexibility Frequently Asked Questions* enumerates each specific provision of which the SEA requests a waiver, which the SEA incorporates into its request by reference.

- 1. The requirements in ESEA section 1111(b)(2)(E)-(H) that prescribe how an SEA must establish annual measurable objectives (AMOs) for determining adequate yearly progress (AYP) to ensure that all students meet or exceed the State’s proficient level of academic achievement on the State’s assessments in reading/language arts and mathematics no later than the end of the 2013–2014 school year. The SEA requests this waiver to develop new ambitious but achievable AMOs in reading/language arts and mathematics in order to provide meaningful goals that are used to guide support and improvement efforts for the State, LEAs, schools, and student subgroups.
- 2. The requirements in ESEA section 1116(b) for an LEA to identify for improvement, corrective action, or restructuring, as appropriate, a Title I school that fails, for two consecutive years or more, to make AYP, and for a school so identified and its LEA to take certain improvement actions. The SEA requests this waiver so that an LEA and its Title I schools need not comply with these requirements.
- 3. The requirements in ESEA section 1116(c) for an SEA to identify for improvement or corrective action, as appropriate, an LEA that, for two consecutive years or more, fails to make AYP, and for an LEA so identified and its SEA to take certain improvement actions. The SEA requests this waiver so that it need not comply with these requirements with respect to its LEAs.
- 4. The requirements in ESEA sections 6213(b) and 6224(e) that limit participation in, and use of funds under the Small, Rural School Achievement (SRSA) and Rural and Low-Income School (RLIS) programs based on whether an LEA has made AYP and is complying with the requirements in ESEA section 1116. The SEA requests this waiver so that an LEA that receives SRSA or RLIS funds may use those funds for any authorized purpose regardless of whether the LEA makes AYP.
- 5. The requirement in ESEA section 1114(a)(1) that a school have a poverty percentage of 40 percent or more in order to operate a schoolwide program. The SEA requests this waiver so that an LEA may implement interventions consistent with the turnaround principles or interventions that are based on the needs of the students in the school and designed to enhance the entire educational program in a school in any of its priority and focus schools that meet the definitions of “priority schools” and “focus schools,” respectively, set forth in the document titled *ESEA Flexibility*, as appropriate, even if those schools do not have a poverty percentage of 40 percent or more.
- 6. The requirement in ESEA section 1003(a) for an SEA to distribute funds reserved under that section only to LEAs with schools identified for improvement, corrective action, or restructuring. The SEA requests this waiver so that it may allocate section 1003(a) funds to its LEAs in order to serve any of the State’s priority and focus schools that meet the definitions of “priority schools” and “focus schools,” respectively, set forth in the document titled *ESEA Flexibility*.

7. The provision in ESEA section 1117(c)(2)(A) that authorizes an SEA to reserve Title I, Part A funds to reward a Title I school that (1) significantly closed the achievement gap between subgroups in the school; or (2) has exceeded AYP for two or more consecutive years. The SEA requests this waiver so that it may use funds reserved under ESEA section 1117(c)(2)(A) for any of the State’s reward schools that meet the definition of “reward schools” set forth in the document titled *ESEA Flexibility*.
8. The requirements in ESEA section 2141(a), (b), and (c) for an LEA and SEA to comply with certain requirements for improvement plans regarding highly qualified teachers. The SEA requests this waiver to allow the SEA and its LEAs to focus on developing and implementing more meaningful evaluation and support systems.
9. The limitations in ESEA section 6123 that limit the amount of funds an SEA or LEA may transfer from certain ESEA programs to other ESEA programs. The SEA requests this waiver so that it and its LEAs may transfer up to 100 percent of the funds it receives under the authorized programs among those programs and into Title I, Part A.
10. The requirements in ESEA section 1003(g)(4) and the definition of a Tier I school in Section I.A.3 of the School Improvement Grants (SIG) final requirements. The SEA requests this waiver so that it may award SIG funds to an LEA to implement one of the four SIG models in any of the State’s priority schools that meet the definition of “priority schools” set forth in the document titled *ESEA Flexibility*.

Optional Flexibilities:

If an SEA chooses to request waivers of any of the following requirements, it should check the corresponding box(es) below:

11. The requirements in ESEA sections 4201(b)(1)(A) and 4204(b)(2)(A) that restrict the activities provided by a community learning center under the Twenty-First Century Community Learning Centers (21st CCLC) program to activities provided only during non-school hours or periods when school is not in session (*i.e.*, before and after school or during summer recess). The SEA requests this waiver so that 21st CCLC funds may be used to support expanded learning time during the school day in addition to activities during non-school hours or periods when school is not in session.
12. The requirements in ESEA sections 1116(a)(1)(A)-(B) and 1116(c)(1)(A) that require LEAs and SEAs to make determinations of adequate yearly progress (AYP) for schools and LEAs, respectively. The SEA requests this waiver because continuing to determine whether an LEA and its schools make AYP is inconsistent with the SEA’s State-developed differentiated recognition, accountability, and support system included in its ESEA flexibility request. The SEA and its LEAs must report on their report cards performance against the AMOs for all subgroups identified in ESEA section 1111(b)(2)(C)(v), and use performance against the AMOs to support continuous improvement in Title I schools.
13. The requirements in ESEA section 1113(a)(3)-(4) and (c)(1) that require an LEA to serve eligible schools under Title I in rank order of poverty and to allocate Title I, Part A funds based on that rank ordering. The SEA requests this waiver in order to permit its LEAs to serve a Title I-eligible high school with a graduation rate below 60 percent that the SEA has identified as a priority school even

if that school does not otherwise rank sufficiently high to be served under ESEA section 1113.

ASSURANCES

By submitting this request, the SEA assures that:

- 1. It requests waivers of the above-referenced requirements based on its agreement to meet Principles 1 through 4 of the flexibility, as described throughout the remainder of this request.
- 2. It will adopt English language proficiency (ELP) standards that correspond to the State’s college- and career-ready standards, consistent with the requirement in ESEA section 3113(b)(2), and that reflect the academic language skills necessary to access and meet the new college- and career-ready standards, no later than the 2013–2014 school year. (Principle 1)

NOTE: The Accountability Workbook (2009), states “In Puerto Rico, Spanish is the language of instruction, as well as the predominant language used in commerce and social interaction. Therefore, limited Spanish proficiency, or LSP, is the category that holds academic significance in Puerto Rico. Accordingly, for purposes of Puerto Rico’s accountability system, LSP will be substituted where there is a reference to Limited English Proficiency (LEP) in the accountability provisions of NCLB. All LSP students are required to participate in the assessment program with appropriate accommodations as needed.” PRDE is participating in the development of Spanish Language Proficiency (SLP) standards and the accompanying assessment through a U.S. Department of Education Enhanced Assessment Grant (EAG). The World-Class Instructional Design and Assessment (WIDA) consortium was awarded the funding through the EAG program to develop the SLP standards and aligned assessments. The PRDE joined WIDA to develop Spanish Language Proficiency Standards which are scheduled to be released in 2013.

- 3. It will develop and administer no later than the 2014–2015 school year alternate assessments based on grade-level academic achievement standards or alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities that are consistent with 34 C.F.R. § 200.6(a)(2) and are aligned with the State’s college- and career-ready standards. (Principle 1)
- 4. It will develop and administer ELP assessments aligned with the State’s ELP standards, consistent with the requirements in ESEA sections 1111(b)(7), 3113(b)(2), and 3122(a)(3)(A)(ii). (Principle 1)

NOTE: The Accountability Workbook (2009), states “In Puerto Rico, Spanish is the language of instruction, as well as the predominant language used in commerce and social interaction. Therefore, limited Spanish proficiency, or LSP, is the category that holds academic significance in Puerto Rico. Accordingly, for purposes of Puerto Rico’s accountability system, LSP will be substituted where there is a reference to Limited English Proficiency (LEP) in the accountability provisions of NCLB. All LSP students are required to participate in the assessment program with appropriate accommodations as needed.” PRDE is participating in the development of Spanish Language Proficiency (SLP) standards and the accompanying assessment through a U.S. Department of Education Enhanced Assessment Grant (EAG). The World-Class Instructional Design and Assessment (WIDA) consortium was awarded the funding through the EAG program to develop the SLP standards and aligned assessments. The PRDE joined WIDA to develop Spanish Language Proficiency assessments. By the 2014-2015 school year, WIDA will have developed aligned assessments for grades K-2.

- 5. It will report annually to the public on college-going and college credit-accumulation rates for all

students and subgroups of students in each LEA and each public high school in the State. (Principle 1)

- 6. If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and uses achievement on those assessments to identify priority and focus schools, it has technical documentation, which can be made available to the Department upon request, demonstrating that the assessments are administered statewide; include all students, including by providing appropriate accommodations for English Learners and students with disabilities, as well as alternate assessments based on grade-level academic achievement standards or alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities, consistent with 34 C.F.R. § 200.6(a)(2); and are valid and reliable for use in the SEA's differentiated recognition, accountability, and support system. (Principle 2)
- 7. It will report to the public its lists of reward schools, priority schools, and focus schools at the time the SEA is approved to implement the flexibility, and annually thereafter, it will publicly recognize its reward schools as well as make public its lists of priority and focus schools if it chooses to update those lists. (Principle 2)
- 8. Prior to submitting this request, it provided student growth data on their current students and the students they taught in the previous year to, at a minimum, all teachers of reading/language arts and mathematics in grades in which the State administers assessments in those subjects in a manner that is timely and informs instructional programs, or it will do so no later than the deadline required under the State Fiscal Stabilization Fund. (Principle 3)
- 9. It will evaluate and, based on that evaluation, revise its own administrative requirements to reduce duplication and unnecessary burden on LEAs and schools. (Principle 4)
- 10. It has consulted with its Committee of Practitioners regarding the information set forth in its request.
- 11. Prior to submitting this request, it provided all LEAs with notice and a reasonable opportunity to comment on the request and has attached a copy of that notice (Attachment 1) as well as copies of any comments it received from LEAs (Attachment 2).
- 12. Prior to submitting this request, it provided notice and information regarding the request to the public in the manner in which the State customarily provides such notice and information to the public (*e.g.*, by publishing a notice in the newspaper; by posting information on its website) and has attached a copy of, or link to, that notice (Attachment 3).
- 13. It will provide to the Department, in a timely manner, all required reports, data, and evidence regarding its progress in implementing the plans contained throughout this request.
- 14. It will report annually on its State report card, and will ensure that its LEAs annually report on their local report cards, for the "all students" group and for each subgroup described in ESEA section 1111(b)(2)(C)(v)(II): information on student achievement at each proficiency level; data comparing actual achievement levels to the State's annual measurable objectives; the percentage of students

not tested; performance on the other academic indicator for elementary and middle schools; and graduation rates for high schools. It will also annually report, and will ensure that its LEAs annually report, all other information and data required by ESEA section 1111(h)(1)(C) and 1111(h)(2)(B), respectively.

If the SEA selects Option A in section 3.A of its request, indicating that it has not yet developed and adopted all the guidelines for teacher and principal evaluation and support systems, it must also assure that:

15. It will submit to the Department for peer review and approval a copy of the guidelines that it will adopt by the end of the 2012–2013 school year. (Principle 3)

CONSULTATION

An SEA must meaningfully engage and solicit input from diverse stakeholders and communities in the development of its request. To demonstrate that an SEA has done so, the SEA must provide an assurance that it has consulted with the State’s Committee of Practitioners regarding the information set forth in the request and provide the following:

1. A description of how the SEA meaningfully engaged and solicited input on its request from teachers and their representatives.

In July 2012, the Secretary of Education posted a letter on PRDE’s website making public Puerto Rico’s intent to submit a request for ESEA flexibility. This letter outlines PRDE’s intention to work towards improving the quality of instruction and students achievement by implementing a new accountability and recognition system, and providing technical assistance during instruction. The Secretary encouraged all stakeholders to share their opinions and comments on PRDE’s intention to apply for the flexibility request. This letter can be found on the PRDE’s website at the following link: <http://www.de.gobierno.pr/sites/de.gobierno.pr/files/cartas/Carta%20secretario%20ESEA.pdf>

From July 2012 through August 2012, PRDE held four stakeholder meetings to present an overview of the ESEA flexibility request and solicit feedback on the primary components of the Flexibility plan. PRDE presented an overview of its ESEA flexibility request and engaged stakeholders in discussions about the proposals components and the potential impact of the plan on schools, teachers, students, and the island more generally. In preparation for each of these meetings, an official memorandum (attachment 12) was sent to invite stakeholders and representatives from all seven regions. Although teachers in Puerto Rico are not currently represented by elected and certified teachers’ unions, teachers are active in four primary teacher- representation organizations, including non-certified teacher unions (for more context please see page 31). Hence, we were deliberate in inviting a significant number of teachers to each of our four public forums.

Approximately 130 stakeholders participated (20 to 40 participants per session) including teachers, school directors, content facilitators, special education personnel, superintendents, social workers, regional coordinators for PPAA/PPEA, parents, civil rights organizations, members of the teacher-representation organizations discussed above and other community members (see Table in pages 12-13). Comment cards were made available to attendees to submit written feedback if desired. A summary of the feedback received from our stakeholders is provided below, organized by principle.

Teachers and other school personnel participated in these forums and feedback from teachers and other school personnel was noteworthy. In particular, teachers were excited about the opportunities that a new differentiated accountability system can bring, and were supportive of the overarching goals and structure of this differentiated system. Most importantly, the teachers believe that this new accountability system will work better for Puerto Rico’s students, including Limited Spanish Proficient (LSP) students and students with disabilities.

Participants provided input on additional incentives for rewards schools (both highest performing and high progress). Examples of suggested incentives included allow reward schools to paint their schools in a different color, allow high school students from reward schools to take entry level college courses (not advanced placement), individualized incentives for teachers and school directors, public recognition through the media, and recognition from the Governor and Secretary of Education. Some of these

suggestions have been integrated in this plan.

As PRDE transitioned to a new administration, a renewed opportunity for stakeholders to provide feedback on PRDE’s ESEA Flexibility proposal was created. Since February 2013, teachers, directors and other members of all the school communities and other interested parties have been invited to provide feedback on PRDE’S ESEA Flexibility plan throughout the process of revising and resubmitting PRDE’s Flexibility proposal. These opportunities to provide feedback will continue once PRDE’s Flexibility proposal is approved and the implementation process begins (see <http://www.de.gobierno.pr/el-de-solicita-comentarios-y-recomendaciones-al-plan-de-flexibilidad-sometido-al-usde>).

The PRDE Flexibility page will be updated periodically as stakeholder feedback is gathered. Examples of updates include: 1) draft sections of the flexibility proposal, 2) proposed timelines for implementation of different aspects of the flexibility proposal, 3) points of contact at PRDE’s central, district and regional levels where stakeholders can direct questions, 4) summaries of implementation activities, and 5) summaries of feedback received by different stakeholder groups.

Stakeholders can provide input and comment in a variety of ways. PRDE launched a dedicated page for the Flexibility plan which includes full drafts of the Flexibility proposal as well as related information (<http://66.129.160.133:9081/Flexibility/>). Feedback can be submitted electronically through the page (commenting directly or uploading documents) or by mailing written comments through the postal service. Stakeholder feedback that is mailed is directed to the Office of the Undersecretary of Academic Affairs and reviewed by staff assigned to the Flexibility plan. PRDE intends to maintain this site open throughout the revision process to provide updates on the ESEA flexibility application. Once approved, the site will be a place for submitting continuous feedback throughout the implementation process.

2. A description of how the SEA meaningfully engaged and solicited input on its request from other diverse communities, such as students, parents, community-based organizations, civil rights organizations, organizations representing students with disabilities and English Learners, business organizations, and Indian tribes.

The following chart outlines the primary meetings conducted with diverse stakeholders to engage them in the consultation process and to inform development of this ESEA flexibility request. As indicated above, comment cards were made available to attendees to submit written feedback if desired. In addition, the letter from the Secretary (described above) was provided to each forum participant.

Primary Stakeholder Meetings Conducted

Date	Forum	Stakeholders	PRDE Central Staff
November and December 2011	UPR Leaders Meetings (4) <ul style="list-style-type: none"> • Four meetings at the University of Puerto Rico, Rio Piedras campus 	UPR President, 15-20 professors in the areas of mathematics, science, Spanish, and English from the UPR, faculty from private universities	Dr. Grisel Muñoz, Undersecretary of Academic Affairs
July 2012	Coordinators Forum (1)	Regional coordinators for PPAA/PPEA	Pura Cotto Lopez, Special Assistant/ Assessment Director
August 2012	Regional Forums (2)	Teachers, school directors,	Pura Cotto Lopez,

	<ul style="list-style-type: none"> • Forum for eastern regions • Forum for western regions 	content facilitators, special education personnel, superintendents, social workers, regional coordinators for PPAA/PPEA, parents, and community members	Special Assistant/ Assessment Director
August 2012	Title I Committee of Practitioners (1)	COP members including central level personnel, parents, school directors, private school representatives and university members	Pura Cotto Lopez, Special Assistant/ Assessment Director
August 2012	Community Leaders Forum (1)	NCLR and LULAC Puerto Rico Chapter members, Fundación Flamboyán, Fundación Ángel Ramos, Fundación Banco Popular, SAPIENTIS, Instituto de Política Educativa y Desarrollo Comunitario (IPEDCO), and university representatives	Pura Cotto Lopez, Special Assistant/ Assessment Director

University Meetings

In November and December of 2011, the Undersecretary of Academic Affairs participated in four meetings with the University of Puerto Rico and other university faculty to discuss the need for ESEA flexibility and its implications for the island. These meetings focused on college and career readiness and the need to lay additional groundwork to support Puerto Rico’s submission of an ESEA flexibility request. Together, the Undersecretary, the UPR president, and UPR faculty discussed the process to align state high school standards with college expectations (i.e., freshman syllabus) in response to Principle 1.

After these meetings, a group of 15-20 UPR professors conducted a 5-week alignment analysis with an emphasis on math, science, Spanish, and English. This process culminated in the presentation of these analyses to the PRDE Undersecretary of Academic Affairs, along with supporting documents, as well as a letter from the UPR president confirming the rigor of Puerto Rico’s standards and alignment with college expectations. This work evidences PRDE commitment to working collaboratively with IHEs to ensure that PRDE’s content standards are college and career ready. It also establishes the foundation for future work with IHEs around the various components addressed throughout PRDE’s Flexibility plan.

Forums

From July 2012 through August 2012, PRDE held four stakeholders meetings with approximately 130 participants including teachers, teacher representative organizations, school directors, content facilitators, special education personnel, superintendents, social workers, regional coordinators for PPAA/PPEA, parents, civil rights organizations, and various members of the community including community leaders. In each of these meetings we had approximately 20 to 40 participants. The

purpose of these meetings was to provide stakeholders with an overview of the flexibility request and to solicit feedback on the primary components of the flexibility request. An official memorandum (attachment 12) was sent to invite stakeholders and representatives from all seven regions to these meetings. Stakeholders had the opportunity to share their opinions, comments, and concerns about this request. A summary of the feedback received from our stakeholders is provided below, organized by principle.

Committee of Practitioners Meeting

During the month of August 2012, PRDE held a meeting with the Title I Committee of Practitioners (COP). This committee is made up of central level PRDE personnel, parents, school directors, university members, and private school representatives. The purpose of this meeting was to discuss a draft of the Puerto Rico ESEA Flexibility Request and to solicit feedback on the primary components of the flexibility request. In advance of the COP meeting, an official memorandum (attachment 12) was distributed to invite COP members to this critical meeting. Stakeholders had the opportunity to share their opinions, comments, and concerns regarding this request. A summary of the feedback received from our stakeholders is provided below, organized by principle. It is important to note that feedback from this specific group of stakeholders indicated that PRDE's Flexibility plan was comprehensive, explicit and complete.

Principle 1

College and career readiness: stakeholders agreed that our standards are college and career ready providing students with a smooth transition from high school to post-secondary studies. Stakeholders agreed that reports documenting analyses of PRDE's standards demonstrate a rigorous alignment between PRDE's standards and curriculum. Stakeholders supported the idea of increasing PRDE's communication with all post-secondary institutions and universities to integrate university programs within the public schools. Stakeholders indicated they believe that PRDE content standards and grade-level expectations provide students with better opportunities internationally and prepare students to be responsible citizens. Stakeholders also expressed their interest in PRDE promoting partnership with business, universities and schools. Stakeholders indicated that these types of partnerships would enable PRDE to reevaluate technical and vocational courses. This reevaluation would provide PRDE with an opportunity to explore ways to provide more technical and vocational courses in the public schools. It would also allow PRDE to develop ways to providing more flexibility for special education students, and other student subgroups, with increased opportunities to enter vocational schools. Finally, stakeholders indicated the importance of demonstrating that all non-tested grade and subject areas within PRDE's curriculum align with PRDE's standards.

Principle 2

Accountability System: stakeholders agreed that the existing accountability system is punitive. Although there were some concerns about the changes in the new accountability system, stakeholders thought that the new methods outlined in PRDE's Flexibility proposal allow for a better classification of schools and better use of data for decision making. Stakeholders provided input on additional incentives for rewards schools (both highest performing and high progress), many of which were consistent across stakeholder groups. As indicated above, proposed incentives included: allow reward schools to paint their school in a different color, allow high school students from reward schools to take entry level college courses (not advanced placement), individualized incentives for teachers and school directors, public recognition through the media, and recognition from the Governor and Secretary of Education. Additional stakeholder suggestions included allowing reward schools should to have their own flag or

mascot and creating science and technology laboratories and obtaining a maintenance contract for one year on technical equipment.

Principle 3

Educator Evaluation: stakeholders indicated that PRDE needs to redesign their current personnel evaluation system and create a more transparent, merit-driven system. Stakeholders indicated they thought that teachers and schools directors are very effective in many ways but need more support and coaching related to instructional practices and instructional leadership. Stakeholders strongly agreed that a fair and effective evaluation system is one that is tied to student achievement. They also agreed on the importance of having formative and summative evaluations in all grades and subjects. Finally, stakeholders indicated that implementation of a new evaluation system will require some restructuring of the school schedule to offer better options to students and create expanded opportunities for classroom visits.

Students with Disabilities and LSP Stakeholders Feedback

The preceding sections of PRDE’s response to Principle 1 have described the global strategies PRDE has used, and will continue to use, to engage and inform all stakeholders in the development and future implementation of the Flexibility plan. However, it is important to note that academic and administrative staff serving students with disabilities and LSP students have been part of the initial consultation phase as PRDE first began to prepare its ESEA flexibility proposal. PRDE is committed to strengthening the participation of all stakeholders in the processes related to the approval and implementation of its Flexibility plan and taking additional steps to ensure that stakeholders from all subgroups have full opportunities to engage the process. To this end, PRDE has developed specific strategies for a closer engagement of representatives of students with disabilities and LSP students.

Specific interventions for engaging subgroups of stakeholders from the LSP and students with disabilities categories are discussed below. In addition to those more customized strategies, PRDE will implement one additional general engagement strategy. PRDE will create new communication tools that target specific stakeholders from the LSP and students with disabilities subcategories. PRDE will publish a press release informing families of students with disabilities and LSP students about PRDE’s work towards implementing ESEA flexibility. This press release will clarify what the new flexibility will allow for how the implications it has for LSP students and students with disabilities. Other publications will focus on potential benefits to LSP students and students with disabilities and detail how parents can leverage the new flexibilities to further support their children’s academic progress. These communications will be widely disseminated with a focused effort on distribution in locations where members of these communities are most likely to see them. To respond to the press release and similar communication vehicles, parents can send their comments electronically through the PRDE ESEA Flexibility page or by postal service.

Parents and Advocates of Students with Disabilities

PRDE has a long history of engagement with parents and advocates of students with disabilities. As such, PRDE will harness the resources already in place to secure the participation of this population in the conversations about the development and implementation of PRDE’s Flexibility plan. The Associate Secretary for Special Education will convene the Special Education Advisory Committee (CCEE, for its acronym in Spanish) and hold regular face-to-face ESEA flexibility stakeholders meetings. The CCEE is charged with advising PRDE Secretary of Education on matters regarding students with disabilities. The

input and feedback gathered at the CCEE meetings will be used to inform future decisions related to the specific interventions and supports made available to special education students and the teachers who work with them. In an effort to ensure all stakeholders from the special education subgroup have an opportunity to engage in and contribute to the development and implementation of PRDE's Flexibility proposal, PRDE will also post a notices informing families about ESEA flexibility and requesting their input at each of the Special Education Service Centers located in all the regions and at the Associate Secretary of Special Education Parents Assistance Office. Staff within these offices will be directed to provide interested parties with comment cards so that stakeholder feedback from parents of students with disabilities can be collected throughout the process. Comment cards will be forwarded to the Undersecretary of Academic Affairs and processed as described previously. The PRDE Flexibility page will be updated periodically as stakeholder feedback is gathered. Finally, Special Education Service Centers staff in coordination with School District Special Education Facilitators will also work to ensure that schools are aware of the need to engage families of students with disabilities in the Flexibility plan process. Schools that receive input or feedback from parents related to PRDE's Flexibility plan will be directed to forward this information to the Undersecretary of Academic Affairs and processed as described previously.

A detailed description of the high-quality plan to engage and solicit input from representatives and families of students with disabilities is below:

Key Milestones/Activities	Detailed Timeline	Party/Parties Responsible	Evidence	Resources
Release official Communication	Summer 2013	Office of the Secretary	Copy of the official communication	Staff time
Post official press announcement	Summer 2013	OFA	Press release	Staff time
Update website including PRDE responses to stakeholders	Ongoing	OFA	PRDE posted communications	Staff time
Post notices at Special Education Service Centers (all regions)	Summer 2013	Associate Secretary for Special Education	Copy of the post	Staff time
Meet with the Special Education Advisory Committee	Summer 2013	Associate Secretary for Special Education	Agenda for the meeting, attendance sheets	Staff time
Hold regular stakeholder meetings	Twice per school year	Associate Secretary for Special Education	Copy of official communication, copy of press release, copy of newspaper announcement, summary of meeting notes	Staff time

Parents and Advocates of Limited Spanish Proficiency Students

In Puerto Rico, LSP students comprise a very small proportion of the student population (.7% as of 2011-2012 school year). The largest subgroup of LSP students speaks English (.5%) followed by French/Creole speakers (.02%). In order to identify representatives for LSP students and subgroups of students, PRDE has consulted with key personnel at Central level and reached out to community advocates. Thus far, PRDE has identified only one advocacy organization, the Asian community and Youth Association, and is currently establishing collaborative relationships with them.

Direct outreach to LSP parents is being coordinated with Title III Part A Program Coordinators and School District Academic Facilitators. Title III Part A Program Coordinators are organizing a series of regional LSP parents' workshops on educational and students support strategies to be held from June to August 2013. These meetings will provide stakeholders from this subgroup with an orientation about PRDE's Flexibility proposal and explain the critical role stakeholders play in its development and implementation. The Title III Part A Program is also taking steps to institute a LSP Parent Advisory Committee. The Program Coordinators will make a call to parents to form the Parent Advisory Committee at the planned workshops. PRDE's goal is to have at least one LSP parent representative per region. Finally, the Title III Part A Coordinators will also work with school district and LSP academic facilitators to ensure that schools are aware of the need to engage LSP families in the Flexibility plan process. Schools that receive input or feedback from LSP parents related to PRDE's Flexibility plan will be directed to forward this information to the Undersecretary of Academic Affairs and processed as described previously.

The table below provides a detailed description of our plan to reach out to families and/or representatives of LSP students. The purpose of the activities listed below is to 1) inform the stakeholders of the approval of the plan and the requirements for schools, teachers and students moving forward as well as 2) gather information and feedback from stakeholders to ensure that PRDE's plan reflects the interests and needs of the school community.

Key Milestones/ Activities	Detailed Timeline	Party/Parties Responsible	Evidence	Resources	Significant Obstacles
Release official Communication	Summer 2013	Office of the Secretary	Copy of the official communication	Staff time	
Post official press announcement	Summer 2013	OFA	Press release	Staff time	
Update PRDE and LSP and Immigrant Program websites including PRDE's responses to stakeholders	Ongoing	OFA	PRDE posted communications	Staff time	
Post notices at all schools	Summer 2013	Title III-A Program	Copy of the post	Staff time	

serving LSP students		Coordinators/ School District Spanish Facilitators			
Post notices at Immigrant Support Services Centers and LSP Support Centers	Summer 2013	Title III-A and Title I-A Program Coordinators	Copy of the post	Staff time	Unforeseen delays in opening the Immigrant Centers
Inform LSP parents at regional parent workshops	August 2013	Title III-A Program Coordinators/ School District Spanish Facilitators/ LSP Academic Facilitators	Copy of agenda for the meeting, copy of attendance list, copy of LSP Parent Advisory Committee members	Staff time	
Hold regular stakeholder meetings	Twice per school year	Title III-A Program Coordinators	Copy of official communication, copy of press release, copy of newspaper announcement, summary of meeting notes	Staff time	

Summary

PRDE is implementing global strategies to ensure engagement of all stakeholders throughout the development and implementation of its Flexibility plan. In addition to the dissemination, small group meetings, and online/traditional commenting processing described above, PRDE is exploring additional feedback gathering and reporting such as the use of surveys/online forms that could be completed by any stakeholder and semi-annual system-wide summarization of stakeholder feedback on the Flexibility plan. This summary will include feedback collected through all engagement and consultation methods and can be used by PRDE central staff to determine which aspects of the Flexibility plan should be modified/adjusted. In addition, PRDE will coordinate meetings with stakeholder groups to address concerns/questions on an as needed basis.

EVALUATION

The Department encourages an SEA that receives approval to implement the flexibility to collaborate with the Department to evaluate at least one program, practice, or strategy the SEA or its LEAs implement under principle 1, 2, or 3. Upon receipt of approval of the flexibility, an interested SEA will need to nominate for evaluation a program, practice, or strategy the SEA or its LEAs will implement under principles 1, 2, or 3. The Department will work with the SEA to determine the feasibility and design of the evaluation and, if it is determined to be feasible and appropriate, will fund and conduct

the evaluation in partnership with the SEA, ensuring that the implementation of the chosen program, practice, or strategy is consistent with the evaluation design.

Check here if you are interested in collaborating with the Department in this evaluation, if your request for the flexibility is approved.

OVERVIEW OF SEA’S REQUEST FOR THE ESEA FLEXIBILITY

Provide an overview (about 500 words) of the SEA’s request for the flexibility that:

1. explains the SEA’s comprehensive approach to implement the waivers and principles and describes the SEA’s strategy to ensure this approach is coherent within and across the principles; and
2. describes how the implementation of the waivers and principles will enhance the SEA’s and its LEAs’ ability to increase the quality of instruction for students and improve student achievement.

Overview

ESEA flexibility represents a pivotal moment not simply for the Puerto Rico Department of Education (PRDE), but for educators, students, parents, and other stakeholders across the island. With this flexibility, the PRDE has a tremendous opportunity to implement rigorous plans to boost student achievement and improve educational outcomes for all students, including students with disabilities and LSP students. In addition, ESEA flexibility will allow PRDE to renew our focus on improving quality of instruction, aligning the educational system to college and career readiness goals, and developing a framework of evaluation and support for Puerto Rico’s educators. PRDE are requesting this set of waivers to empower PRDE to meaningfully improve instruction and increase achievement for all students in Puerto Rico.

Implementation of Principle 1 is consistent with PRDE’s ongoing efforts to implement rigorous, approved, and adopted college and career ready academic content standards in Spanish language arts and mathematics in grades K-12. PRDE’s standards include grade-specific content expectations for all students in each grade level. A gap analysis study conducted in September 2011 showed a high correspondence between PRDE’s academic content standards and the Common Core State Standards. In addition, the University of Puerto Rico has conducted an analysis that determined that the PRDE standards are sufficient to ensure student success in college and career. Thus, PRDE’s implementation of Principle 1 is consistent with its current system-wide efforts to improve education across the island. Principle 2 proposes a differentiated accountability system that sets new ambitious AMOs; identifies priority, focus, and reward schools; identifies differentiated supports for schools in all categories including the remaining non-categorized Title I schools; and engages the community and other stakeholders to participate in educating Puerto Rico’s school children. PRDE recognizes the need for the public education system to demonstrate improved student outcomes and is committed to reform activities that result in improved teaching and learning. PRDE’s implementation of Principle 2 is consistent with the Secretary and Governor’s overall goals for education. PRDE believes that ongoing work to implement rigorous, college and career ready standards can support new strategies for customizing the supports available to schools throughout the system. PRDE sees the implementation of Principles 1 and 2 as complimentary efforts that support a common goal for its schools. Principle 3 requires a commitment to implementing an evaluation process that recognizes and enhances teacher and school director strengths while identifying and supporting their areas of need. PRDE believes that implementation of Principle 3 is necessary in order to make significant improvements in the quality of teaching and learning in its schools. By setting standards for the delivery of content and the use of instructional practices, and linking those standards to some expected improvement in student

achievement, PRDE’s implementation of Principle 3 supports and advances its efforts under Principles 1 and 2. Finally, Principle 4 exhibits PRDE’s determination to reduce the administrative burdens inflicted on our districts and schools.

PRDE believes that all of the work outlined in its Flexibility plan will increase PRDE’s capacity to achieve greater success in closing achievement and graduation gaps. For far too long, significant portions of PRDE’s student population have struggled to achieve at desired levels. Implementation of PRDE’s academic content standards is the vehicle to reenergize our focus on classroom instruction and this flexibility is a timely opportunity to create processes, procedures and systems that will allow for long-term, continuous improvement. Combined with the infrastructure improvements PRDE has made over the last several years, PRDE is able to set realistic and appropriate achievement goals and hold PRDE’s schools accountable for student growth. PRDE believe that our schools can both grow achievement levels for individual students and close gaps between groups of students.

The implementation of the plans described in this ESEA flexibility request will enhance the ability of the Puerto Rico Department of Education and the schools across the island to increase the quality of instruction for all students and improve their achievement levels. Each of the three Principles focus attention on critical elements of school system operations. Puerto Rico welcomes the opportunities created by the Flexibility Waiver and is eager attempt new approaches to improving student achievement. Similarly, PRDE appreciates that fact that the Flexibility Waiver has focused the attention of leaders across the island on key reform areas and created new opportunities for PRDE to engage stakeholders and benefit from new thinking and ideas about strategies to reform the system. Puerto Rico’s dedication to accountability, support for educators, spirit of collaboration, and excellence for all students will be essential in guiding Puerto Rico in preparing world-class college and career ready students.

Influencing development of this flexibility request and its various components was the guidance set forth by the U.S. Department of Education (USDE) in a number of resources including *ESEA Flexibility*, *ESEA Review Guidance*, and *ESEA Flexibility Frequently Asked Questions*, as well as other supporting documents developed by the USDE and the Council of Chief State School Officers (CCSSO).

Background and Context for Puerto Rico’s Flexibility Request

The Puerto Rico Department of Education (PRDE) is requesting flexibility regarding specific requirements of the federal No Child Left Behind Act of 2001 (NCLB). As a recipient of federal education funds, the PRDE faces the same responsibility that states face to implement and comply with federal legislation. PRDE’s intention is to implement rigorous plans to improve educational outcomes for all students in Puerto Rico, including students with disabilities and limited Spanish proficiency students, close achievement gaps, improve the quality of instruction, and ensure college and career readiness. The educational system in Puerto Rico has some significant differences from other states and these differences represent unique challenges to the systemic change that is needed to improve educational outcomes. The provision of NCLB flexibility will better meet the unique needs of students, teachers, schools, and districts island-wide in Puerto Rico.

Puerto Rico’s Vision and Mission

The vision of the Puerto Rico Department of Education is that our students should be the primary

focus of the system, our teachers are the main agent of change, and our school directors are the facilitators of all processes which occur within each of our schools. To help make this vision a reality, the mission of the Department of Education is to promote the development and formation of the student based on the core values of society, through a free education system accessible to all.

Puerto Rico's Educational System

The Puerto Rico Department of Education is the governmental entity responsible for providing primary and secondary public education in Puerto Rico. Puerto Rico has been working since the 2002-2003 school year to implement the requirements of the No Child Left Behind Act of 2001 (NCLB). Over the years, the PRDE has worked to develop rigorous standards for Spanish language arts, mathematics, science, and English as a second language; it has also developed a system incorporating general assessments (the *Pruebas Puertorriqueñas de Aprovechamiento Académico*; PPAA) as well as an alternate assessment for students with the most significant cognitive disabilities (the *Pruebas Puertorriqueñas de Evaluación Alternativa*; PPEA). The PRDE has worked to submit evidence to the U.S. Department of Education demonstrating its compliance with the law's mandates, and the validity of its implemented standards and assessment systems for their intended purposes.

Each school in Puerto Rico is required to develop (or modify) annually either an action plan for continuous improvement or a school improvement plan. These plans are one element within the Comprehensive School Plans (CSP) that every school develops. The CSP allows each school to :

- document student achievement, staffing, and available resources for the current year using data available through the PRDE central data system
- document the analysis of trends in student achievement, identify root causes for poor student performance, and propose strategies for improving student achieving
- outline school-wide professional development needs and specify additional professional development necessary to meet the needs of specific subgroups of students within the school
- plan activities that reflect the interests and needs of parents, plan initiatives to engage parents in the school's educational processes and promote strong and effective family-school relationships
- plan for the use of local and federal funds for the current school year

CSP's contain addition detail regarding a school's academic plan and this detail varies by school. School Improvement Grant schools use the school improvement plan based on the results of a SIG needs assessment. All other schools develop action plans based on the Florida and Islands Comprehensive Center, FLICC needs assessment). PRDE uses integrated technology tools to guide the development of these action plans and collect the data for easy monitoring by PRDE.

The PRDE oversees one island-wide education system comprising 1,457 public schools serving more than 471,000 students from kindergarten through grade 12 and employing 31,136 teachers (see Exhibit 1 for the number of schools per level). Of these teachers, 78% have a bachelor's degree, 21% have obtained a master's degree and less than 1% has a doctoral degree. Only about 0.60% of the teachers have less than a bachelor's degree. Most schools in the system (99%) are Title I schools; only

18 public schools are state funded. About half of all the public schools (51%) are considered rural.

Exhibit 1. Number of Schools per Level and Grades Served

School Level	Grades	Number of Schools
Elementary	PK-6	851
Middle School	7-9	209
High School	10-12	163
“Segunda Unidad”	K-9	170
Secondary	7-12	40
All Grades	K-12	24

Structure

The structure of the education system in Puerto Rico is unique in several ways. First, Puerto Rico is a unitary system serving as both the state educational agency (SEA) and a single local education agency (LEA). The PRDE consists of the central level, led by the Secretary of Education (appointed by the Governor of Puerto Rico and a member of the executive cabinet), regions, school districts, and 1,457 schools (see Exhibit 2). The central level consists of two main undersecretaries: one for academic affairs and one for administrative affairs. The central office also includes a Secretariat of Special Education headed by a deputy secretary. This secretariat handles all matters related to administration, technical assistance, transition, transportation, equitable services and provision of services to students with disabilities and compliance with these provisions.

For administrative purposes, the PRDE divides the geographic area of Puerto Rico into seven regions and 28 school districts. A region is a functional unit of the PRDE under the supervision of a director in which PRDE develops administrative facilitation work for the benefit of school districts and schools falling within a geographical area. Regional directors report directly to the undersecretary of administrative affairs at the central level and are responsible for a variety of activities such as organizing training programs for school administrative personnel (e.g., budget, school staff management, fiscal audits, and purchasing procedures); coordinating transportation services; organizing academic, recreational, and cultural activities for schools; and managing professional services for students with disabilities. Regions are also responsible for providing support to address administrative issues in different schools and providing recommendations for addressing such problems. In addition, regions support schools on discipline norms; maintain teacher certification records; provide orientation to school directors on services and systems related to school security as well as any other administrative function delegated by the Secretary of Education. The Fiscal and Programmatic Monitoring staff located in each Region will be an important part of the oversight of ESEA Flexibility plan implementation. PRDE has created a schedule that establishes the information sessions and trainings that will be held with Regional and district level staff to ensure 1) sharing of information about the Flexibility requirements, 2) collection of input and suggestions and 3) effective implementation.

Although PRDE uses the term “districts,” these entities are not independent local educational agencies (LEAs). This branch of the PRDE operates under the direction of a district superintendent and oversees all academic activities to the schools within each district’s geographical area. District

superintendents report directly to the undersecretary of academic affairs at the central level. Also at the district level are auxiliary superintendents whose responsibilities include direct technical assistance to school directors, and facilitating and overseeing compliance of federal regulations and procedures. Districts also have academic auxiliary superintendents who oversee all academic activities within the schools. Under the academic auxiliary superintendents are academic facilitators who serve as instructional leaders, coaches for teachers, and facilitate professional development on curriculum and instructional strategies. These facilitators also provide support in the design of programs adjusted to the needs of students in the school, and collaborate with school directors in developing programs for talented students, low-achieving students, students at-risk of dropping out, and special education and LSP students.

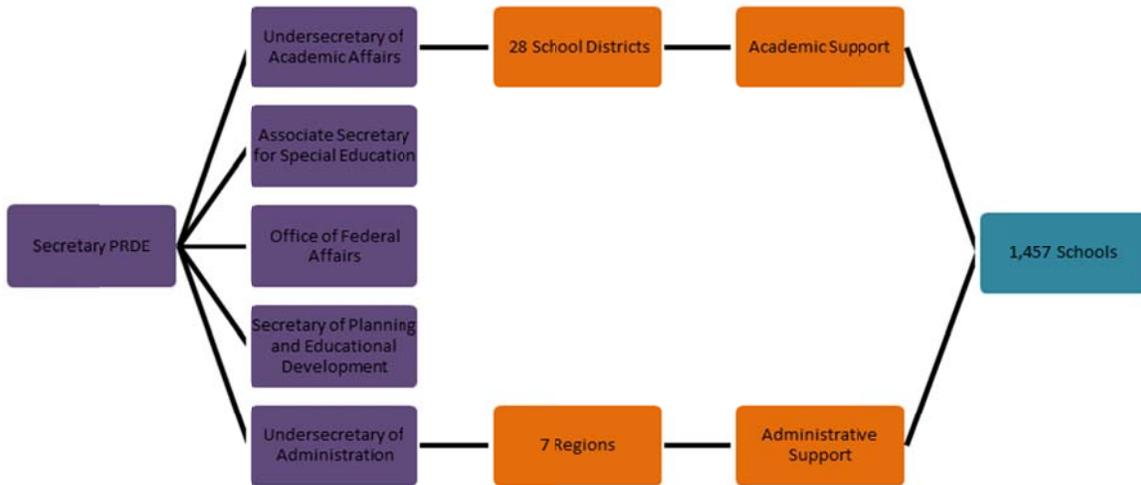
Finally, districts are also responsible for coordinating professional development activities for teachers and other support personnel, as well as running the professional development centers established by the Secretary of Education. All school districts also have a coordinator that oversees the Committee for Parents, whose role is to provide technical assistance to parents, coordinate workshops, and encourage parental involvement in the school community.

As stated before, PRDE as a whole, is the sole LEA operating in Puerto Rico. These districts do not have autonomous decision-making authority, nor do they have fiscal independence. All fiscal responsibilities, communications, and decisions reside within the central level. Regions and districts disseminate information and are granted specific authority to make some decisions.

At the school level, each school has a school director (the equivalent of a principal) who is responsible for administrative tasks and acts as the instructional leader for all teachers in the school. The primary role of teachers is to facilitate the instructional and learning process to help students discover and develop their abilities, as well as to help them develop attitudes and behaviors that enable them to integrate with the fundamental values of today's society.

Given its unique organizational and administrative structure, PRDE executes the responsibilities of both an SEA and an LEA. As has been the case with respect to Flexibility waivers submitted by States, PRDE will outline how it will, from the SEA perspective, develop policies and guidelines, provide materials and technical assistance, engage in oversight and monitoring and provide leadership to all schools and districts. As the LEA, PRDE will explore the various options for implementation that have been proposed in other State's flexibility waivers.

Exhibit 2. Relationships Between PRDE Levels



Note. This diagram is a simplified version of the official PRDE organizational chart which is included in this flexibility request as Attachment 13.

Laws and Regulations

The PRDE is presided by the Law No. 149 of July 15, 1999, also known as the Organic Act of the Puerto Rico Department of Education, which forms its current structure with other legal statutes. This law outlines the roles and responsibilities of each member of the school community including students, teachers, support staff, the school director, and district facilitators. It also delineates the roles of the Secretary of Education, who is authorized to create and implement regulations for the public school system, known as *Cartas Circulares* (Circular Letters) and *Reglamentos* (Regulations).

Law No. 149 established the policies of the Puerto Rico public school system and authorized the designation of the schools on the island as community schools providing them with the autonomy to govern certain academic, fiscal, and administrative matters, while belonging to a coherent education system. Such autonomy includes establishing institutional priorities with regards to selecting instructional personnel, adapting academic programs to meet the needs of the student population, experimenting with new organizational and instructional strategies, developing extra-curricular activities that benefit the students and the community, and preparing and administering the school budget, among other responsibilities. Although public schools in Puerto Rico have certain autonomy, they do follow the Department's policies such as school calendars, curricula, and other policies and laws (local and federal).

Since Law No. 149 does not address internal policies, Secretaries of Education usually issue policies known as *Cartas Circulares* (Circular Letters) to address those needs. A circular letter is a publication or communication to provide guidelines on how to comply with a regulation or statute and is authorized by the Secretary of Education. In essence, these are the vehicle to transmit communications between the secretary and personnel at the central, regional, district, and school

level and these guide the fiscal, academic, and administrative procedures of the Department of Education. For example, *Carta Circular 17-2010-2011* establishes the guidelines for an academic school calendar that must include at least 180 instructional days and six daily hours of instruction. In addition, Regulation rules (*Reglamentos*) are meant to carry out the organic law and its amendments. The regulations are authorized by the Secretary of Education and the Secretary of State.

Language of Instruction

Although Spanish is the language of instruction in Puerto Rico, the Law No. 149 states that each school must help its students acquire mastery of oral and written communication in both Spanish and English. PRDE's dual language requirement is different from other states and adds an additional requirement outside of NCLB requirements. The public school system in Puerto Rico was established at the turn of the 20th century under United States control of the island. Given the extent of the U.S. influence on the island, the structure of public schools in Puerto Rico at the time was set up to mirror that of the U.S. – schools would be free of charge to students and funded by the state. The official language of instruction has fluctuated between Spanish and English over the years. In 1901, English was imposed as the language of instruction only to be overturned in 1915 when Spanish became the official language. These changes occurred several more times throughout Puerto Rico's educational history, including the use of both languages during instruction at varying levels depending on the grade. In 1949, Spanish was declared the "vehicle of instruction" by Instruction Commissioner Mariano Villaronga. Since then, English as a second language has been taught as part of the K-12 curriculum every year.

Student Population

During the 2011-2012 school year, approximately 471,677 students were enrolled in Puerto Rico's public schools. These public school students account for approximately 57% of the island's total population of students in grades PK-12 while 43% of Puerto Rico's students attend private schools. This percentage is higher than reported national rates where enrollment in private schools is 10% (NCES, 2010). The population of students who attend public versus private schools may have significant demographic patterns such as the distribution of economic status and disability.

PRDE's public school population is fairly homogenous; less than 3% of the student population consists of ethnicities other than Puerto Rican (Hispanic, non-Puerto Rican 1.71%; American Indian/Alaskan Native 0.30%; White, non-Hispanic 0.15%; Black/African American 0.03%; Asian 0.01%; and Native Hawaiian/Pacific Islander 0.01%). The two largest subgroups on the island are students with disabilities and economically disadvantaged students. Approximately 20% of all students in our public school system have been identified as students with disabilities, compared to approximately 13% of public school students nationally (NCES, 2011). The Center for Special Education Services (*Centro de Servicios de Educación Especial*, CSEE) coordinates the process of identifying students eligible to receive special education services. The CSEE has increased efforts to develop procedures and guidelines for the appropriate identification and evaluation of students with disabilities. Despite the availability of these procedures, the disparity between Puerto Rico's rate and the national average indicates potential issues with the identification of students who are eligible for services and the adequacy of the training provided to school and district staff members, including teachers, and the reliability of the screening evaluations.

Limited Spanish proficiency (LSP) is the student group in Puerto Rico that under the USDE approved Accountability Workbook (2009) replaces the Limited English Proficient (LEP) subgroup. There are currently 2,640 students in the public schools that have been identified as LSP. The PRDE provides

services and support to these students in the acquisition of Spanish proficiency and meeting academic standards. Just as with the LEP subgroup, once these students demonstrate language proficiency using the state identified language proficiency test, they exit LSP status.

Graduation Rate

PRDE has transitioned to the U.S. Department of Education (USDE) cohort graduation rate. Graduation rate uses a standard adjusted cohort measurement that measures the number of students who graduate in a standard number of years with a regular high school diploma by the number of students who form the adjusted cohort for that particular class. For U.S. high schools, which are predominantly four years long, the cohort starts with grade 9 and ends with graduation in grade 12. In Puerto Rico, 83% of PRDE's high schools consist of three grades spanning 10th through 12th grades. As such, Puerto Rico will report a three-year adjusted cohort graduation rate starting with grade 10 and ending with graduation in grade 12, as approved by the USDE in 2009.

PRDE's graduation rate cohort consists of first-time 10th graders in the 2009-2010 school year at each high school, plus any students who transferred into the cohort through the 2010-2011 and 2011-2012 school years, minus any students who show evidence of: transferring out, emigrating to another country, or passing away during the three-year period. Students who leave for any other reasons, or do not present the required evidence, may not be removed from the cohort. The PRDE used the transitional graduation rate as described in the approved Accountability Workbook (2009) through the 2011-2012 school year. This rate was an adaptation of the method recommended by the National Center for Education Statistics. The first true cohort graduation rate based on the cohort that should have graduated in the 2011-2012 school year became available in January 2013. The following table describes the results of the first true cohort graduation rate for all students and subgroups.

Student Population	Rate First Class (2009-2010)
All Students	64.45
Subgroups	
Economically disadvantaged	60.65
With disabilities	54.93
LSP	52.93
Ethnicity	
Multicultural or Multiracial	93.33
Hispanic (not Puerto Rican)	92.01
White or Caucasian (not Hispanic)	88.23
Puerto Rican	64.01

PRDE is considering including additional years continuously into PRDE's calculation of graduation rates to better account for the experience of students with special needs who typically stay in high school longer than three years.

Challenges

Puerto Rico has several unique challenges that are explained below and help to demonstrate PRDE's need for ESEA flexibility. Key among these challenges is: 1) a significant number of schools in

improvement, 2) the need for implementation of a longitudinal data system and 3) teacher representative organizations.

Schools in Need of Improvement

For the 2012-2013 school year, a total of 1,321 (91%) schools have been categorized as needing improvement under ESEA. About 52% of these schools have been in improvement for four years or more (see Exhibit 3 for the number of schools in each school improvement category, by school level). Though a significant number of mainland states also experience an annual increase in the number of schools in improvement, Puerto Rico has a unique challenge; all but 151 of Puerto Rico's public schools have been identified as "in need of improvement" under NCLB. This ESEA flexibility request will allow PRDE to focus critical funds on the students that need the most assistance.

Exhibit 3. Number of Schools under ESEA in Need of Improvement, by School Improvement Category and School Type, School Year 2012-2013

	Year 1	Year 2	Corrective Action	Restructuring 1	Restructuring 2	Restructuring 3	Restructuring 4	Restructuring 5	All Levels of Improvement
Elementary Schools (K-6)	78	81	203	123	30	49	64	117	745
Middle Schools (7-9)	3	0	10	13	8	9	19	145	207
Segunda Unidad (K-9)	4	4	31	36	9	18	25	38	165
Secondary Schools (7-12)	1	3	6	3	0	4	1	15	33
High Schools (10-12)	1	3	14	16	7	9	15	95	160
All Grades (K-12)	1	2	3	1	1	1	0	2	11
All Schools	88	93	267	192	55	90	124	412	1321

Data Systems

Although PRDE collects significant information on students and schools, including demographic information and performance data, obstacles to analyzing and using this data currently exist. For example, the information on students with disabilities is located in two different systems, the MIPE Web (information system for special education students) and the island-wide student information system (*Sistema de Información Estudiantil*, SIE). This poses a challenge when tracking these students in the system since students have a different ID number in each system. PRDE's department recently received a Statewide Longitudinal Data Systems (SLDS) grant from the U.S. Department of Education. PRDE will contract two separate providers to develop the Statewide Longitudinal Data System: one provider will develop the database, a second provider will administer the development process and provide technical assistance. The contracting process is currently underway and the expected date of the contract award is on or before August 1st, 2013. The development of a Statewide Longitudinal Data System is a necessary step forward towards establishing a K-16 data system. As we implement this work, the integration between data systems will improve and PRDE will have the ability to provide schools with more robust and complete data sets that can inform their school improvement planning and teacher evaluation decisions.

Puerto Rico's Statewide Longitudinal Data Systems Grant

Our SLDS grant will support the design, development, and implementation of a K-12 statewide longitudinal data system with the ultimate objective of enhancing education policy and operational decisions with hard data pertaining to student achievement over time. It also aims to establish the necessary organizational, political, procedural, systemic, and human resource mechanisms necessary to perpetuate its use by education stakeholders at all levels (central, regional, district, and school levels). The objectives of this effort are to:

- effectively implement the K-12 portion of what shall be Puerto Rico's full-fledged statewide longitudinal data system;
- establish and perpetuate an effective K-12 data governance and quality function that shall proactively guarantee information reliability; and
- uniformly instill an information-based education performance management culture among vested stakeholders.

It is PRDE's intention to assist districts and schools with technology that results in increased use and analysis of data that will inform instruction. PRDE are working towards creating a culture of decision making based on data coordinating workshops for teachers and administrators, presenting information at conferences, and disseminating relevant literature. For instance, in June 2012, we conducted a data use workshop for regional coordinators, school directors, and superintendents from all seven regions of the island. The purpose of this workshop was to advance PRDE's efforts toward effective communication and improve the use of PPAA results data. The workshop was designed to support the following goals: 1) improve participants' understanding of assessments results and interpretations; 2) improve participants' knowledge and ability to purposefully utilize data in school-wide decision making; and 3) strengthen participants' ability to access and use accurate data to inform decisions. Workshops that support the adoption of data driven decision making are discussed throughout this Flexibility proposal. With respect to use of the dashboards, PRDE will offer workshops at various times throughout

the year including 1) before each school year, 2) during the creation of CSPs, 3) and at planned professional development meetings scheduled during the school year. The latter group of trainings may focus on the use of PRDE’s dashboards. These trainings will be planned by the Office of the Undersecretary of Academic Affairs. Staff from the district and Central regions will support this work. In addition, schools may detail a request for training on data driven workshops within their CSP and improvement or action plans. Schools may also identify need for additional training on data driven decision as a result of the needs assessments. These workshops will be planned and delivered through a collaboration between schools and district level staff. External providers may also be able to assist in these efforts. In this way, PRDE has ensured that all educators have access to data driven decision making training and created school-level opportunities for additional training. The format, timing and integration of this training will be done in such a way that PRDE can balance the need for training with existing constraints surrounding teacher time.

Teacher Representative Organizations

Finally, our teachers in Puerto Rico are not currently represented by elected and certified teachers’ unions. However, teachers are active in five primary teacher representative organizations, including non-certified teacher unions. The discussion below provides critical information on teacher mobilization and the role of teacher representative organizations on the island.

There are several laws that regulate the right of public employees to organize and participate in syndicated organizations. Laws 134 of 1960 and 139 of 1961 both conceded public employees the right to form “bona fide” organizations with the purposes of seeking employees’ social and economic progress as well as promoting the efficiency of public services. These organizations, though they lack legal authorization to serve as traditional unions, in many ways act and perform activities similar to them. For example, in certain cases, syndicated organizations can negotiate with employers or write contractual letters.

Law No. 45 of 1998, also known as the “Puerto Rico Public Service Employee Relations Law” (*Ley de Relaciones de Trabajo de Servicio Público de Puerto Rico*) grants public employees of traditional central government agencies, for whom the Public Service Employee Relations Law does not apply, the right to organize and negotiate work conditions under the parameters established by the law (45). Thus, Law No. 149, PRDE’s organic law, recognizes the right of teachers to participate in syndicated organizations as regulated by Law No. 45.

Currently, there are five primary teacher-representative organizations in Puerto Rico – the *Federación de Maestros*, the *Asociación de Maestros*, *Únete, Educamos*, and *Educadores Puertorriqueños en Acción*. Although some of these organizations have been decertified since 2008 and do not presently have the legal right to represent teachers in collective bargaining, the presence of these organizations has real policy implications for the PRDE. Each of the existing teacher representative organizations, in addition to the organizations for school directors (*Organización Nacional de Directores de Escuela de Puerto Rico* and *Educadores Puertorriqueños en Acción*), remain actively involved in the education arena, offering their opinions on every matter related to the PRDE.

Response to Challenges

Puerto Rico has a modern, complex educational system with rigorous academic and content standards, and aligned curriculum, that are well suited to ensure that students who master the standards are college and career ready. PRDE are successfully making progress to enhance our schools and are implementing several grants and other island initiatives to ensure continued progress. As indicated

above, this alignment has been evidenced by the analysis completed by the UPR. This request, if approved, will allow the PRDE to make quantum level changes to make PRDE’s system more effective for all students, especially SWDs and LSP students. It will also provide PRDE with an opportunity to implement much needed system-level reforms that could not be done if the existing federal requirements remain unchanged.

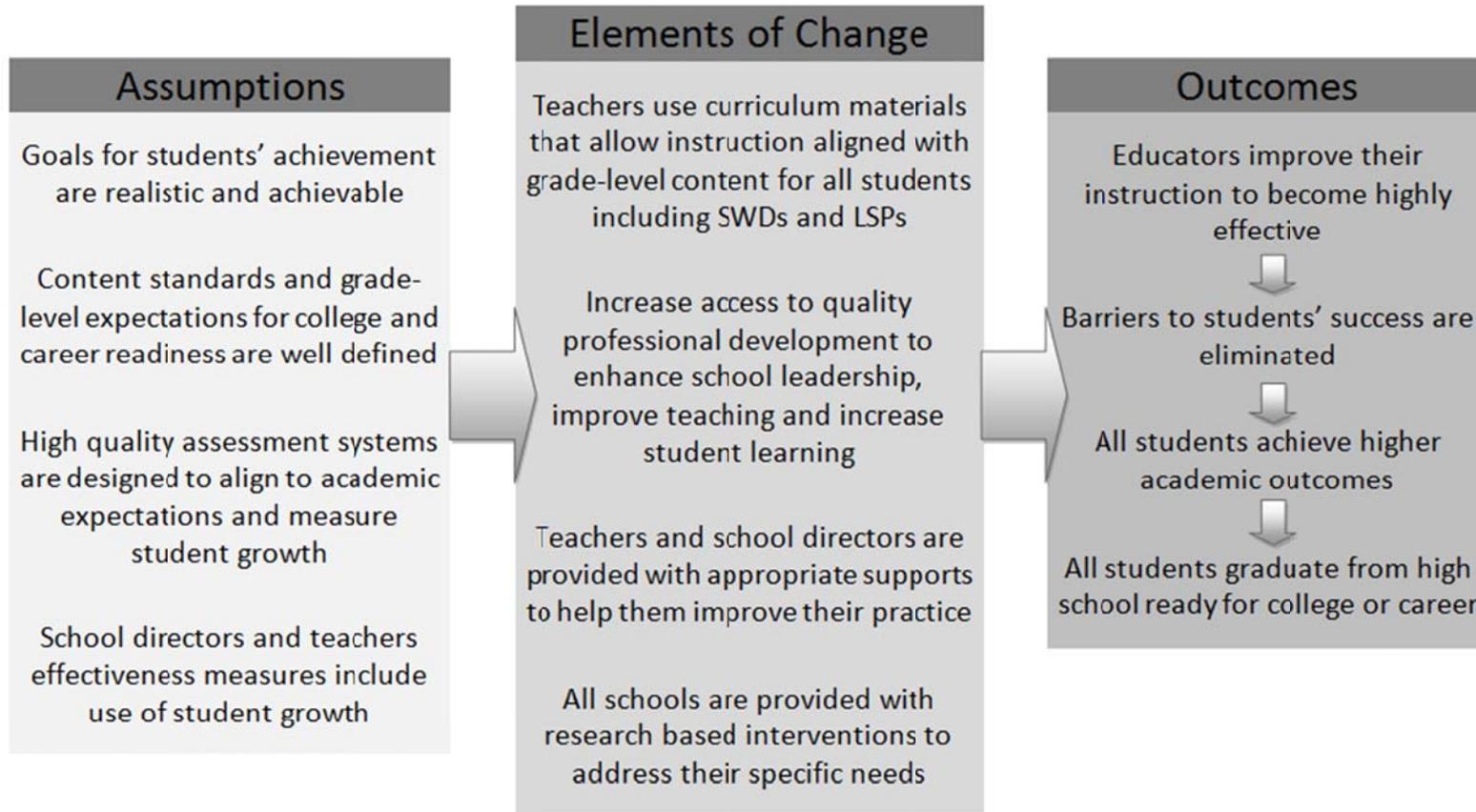
Theory of Action Guiding PRDE’ Flexibility Request

The theory of action in Exhibit 4 provides a broad representation of the logic guiding this flexibility request. The first box contains the assumptions about each part of PRDE’s education system addressed in principles 1 through 3. The last statement in the outcomes box is the ultimate goal of the PRDE’s accountability and assessment system. The arrows show the conditional relationships between the claims.

PRDE recognize the impact of different variables such as effective educators and school leaders, instructional materials, and supports and interventions have on student achievement. PRDE are committed to ensuring that every student in PRDE’s public schools achieves mastery in core content areas and graduates from high school with the knowledge and skills necessary to succeed in college or career. Thus, in order to achieve the outcomes illustrated in the theory of action, we need to achieve the outcomes listed for the PRDE educational system. During the last five years we have improved considerably PRDE’s standards, assessment, and accountability system; these efforts serve as the foundation for the proposed plans in this ESEA flexibility request related to the elements of change.

PRDE believe that providing teachers and school leaders with appropriate curriculum materials, high quality professional development, and a strong system of supports will in turn eliminate obstacles for student success and create a public system where teachers are highly effective and every student achieves to high expectations. In these system students from PRDE’s public schools are able to graduate from high school ready for college and careers.

Exhibit 4. Theory of Action



**PRINCIPLE 1: COLLEGE- AND CAREER-READY EXPECTATIONS
FOR ALL STUDENTS**

1.A ADOPT COLLEGE- AND CAREER-READY STANDARDS

Select the option that pertains to the SEA and provide evidence corresponding to the option selected.

<p>Option A</p> <p><input type="checkbox"/> The State has adopted college- and career-ready standards in at least reading/language arts and mathematics that are common to a significant number of States, consistent with part (1) of the definition of college- and career-ready standards.</p> <p>i. Attach evidence that the State has adopted the standards, consistent with the State’s standards adoption process. (Attachment 4)</p>	<p>Option B</p> <p><input checked="" type="checkbox"/> The State has adopted college- and career-ready standards in at least reading/language arts and mathematics that have been approved and certified by a State network of institutions of higher education (IHEs), consistent with part (2) of the definition of college- and career-ready standards.</p> <p>i. Attach evidence that the State has adopted the standards, consistent with the State’s standards adoption process. (Attachment 4)</p> <p>ii. Attach a copy of the memorandum of understanding or letter from a State network of IHEs certifying that students who meet these standards will not need remedial coursework at the postsecondary level. (Attachment 5)</p>
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1.B TRANSITION TO COLLEGE- AND CAREER-READY STANDARDS

Provide the SEA’s plan to transition to and implement no later than the 2013–2014 school year college- and career-ready standards statewide in at least reading/language arts and mathematics for all students and schools and include an explanation of how this transition plan is likely to lead to all students, including English Learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with such standards. The Department encourages an SEA to include in its plan activities related to each of the italicized questions in the corresponding section of the document titled *ESEA Flexibility Review Guidance for Window 3*, or to explain why one or more of those activities is not necessary to its plan.

2007 Content Standards and Grade Level Expectations

The Puerto Rico Department of Education (PRDE) has taken several steps over the preceding four years to make improvements in PRDE's systems of standards, assessment, and accountability. PRDE made PRDE's first leap forward when we revised our academic content standards in 2007 to support more rigorous academic instruction and alignment with national expectations. PRDE formally approved and adopted new academic content standards in Spanish language arts and mathematics for grades K-12 in 2007. These standards include grade-specific content expectations for all students in each grade level. PRDE included teachers from each of the content areas across all regions, curriculum specialists, special education teachers, professors from a variety of public and private universities, stakeholders from community agencies, and community members familiar with the instructional needs of students with disabilities and limited Spanish proficiency speakers, in all different stages of the development and revision of the 2007 content standards. PRDE also requested feedback from the public by holding public hearings during the development of the new standards and considered public commentary on the issue.

Several studies evidence the success of this revision process and the rigor of PRDE's 2007 content standards. The first study was conducted by the National Center for Educational Statistics at the U.S. Department of Education (2009). This study was one of several commissioned by the USDE to investigate possible explanations for the very low performance of Puerto Rico's students on the National Assessment of Educational Progress (NAEP) and included a review of our previous (2000) and current (2007) academic content standards in mathematics in relation to the NAEP mathematics frameworks. This study revealed that the 2007 standards were "aligned well with NAEP's content standards and objectives" and were superior to the 2000 version of our standards. Specifically, the 2007 PRDE content standards were written at the appropriate levels of specificity and met the alignment criteria of categorical concurrence and balance of representation, as well as range-of-knowledge correspondence.

To ensure that its content expectations for all students in Puerto Rico remain rigorous, we also commissioned an evaluation of the alignment between PRDE's 2007 academic content standards in Spanish language arts and mathematics and the Common Core State Standards (CCSS). Specifically, we wanted to determine the degree to which the CCSS address the academic content covered in the PRDE content standards and determine the overall quality of the PRDE content standards compared to the CCSS. The crosswalk study compared the PRDE Spanish language arts (SLA) content standards and grade-level expectations to the CCSS English language arts (ELA) standards in grades 3-8 and 11 and the PRDE mathematics content standards and grade-level expectations in grades 3-8 and 11 to the CCSS mathematics standards. Although the PRDE content standards in SLA provide the framework for ensuring mastery of the Spanish language in a similar manner to the way in which ELA standards provide the framework for ensuring mastery of the English language in most U.S. schools, researchers acknowledged some differences in the areas of learning culture and history through writing, non-fiction, and literature while conducting the study. This study used Depth of Knowledge (DOK) rubrics based on the model developed by Norman Webb (1997) ranging from 1 (the least cognitively complex) to 3 (the most cognitively complex). The study also compared the content covered by PRDE content standards to the content covered by the CCSS by determining whether the content addressed by each PRDE grade-level expectation could be found in one or more of the Common Core standards. The match between the level of content covered in the PRDE content standards in Spanish language arts and mathematics and the content covered in the Common Core State Standards in both content areas was very high (see Exhibit 5).

Exhibit 5. Coverage of PRDE Content Standards by Common Core State Standards

	Math		Language Arts	
	# of PRDE expectations	% of PRDE expectation	# of PRDE expectations	% of PRDE expectations
Covered by 1 Common Core standard	243	58%	294	82%
Covered by 2 or more CCSS	113	27%	21	6%
Not covered	65	15%	42	12%

Eighty-eight percent (88%) of the PRDE content standards in Spanish language arts are covered within the CCSS in English language arts, and 85% of the PRDE content standards in mathematics are covered within the CCSS in mathematics. The overall findings from the crosswalk study indicated a strong correspondence between the DOK in the PRDE content standards and the DOK in the CCSS (see Exhibit 6 and Exhibit 7). Taken together, these findings suggest that the PRDE content standards are rigorous and of adequate complexity.

Exhibit 6. Average Depth of Knowledge (DOK) by Grade: Mathematics¹

	Grade 3	Grade 4	Grade 5	Grade 6	Grade 7	Grade 8	Grades 11-12
CCSS	1.36	1.36	1.50	1.28	1.79	1.71	1.91
PRDE	1.35	1.35	1.33	1.46	1.44	1.71	1.70

Exhibit 7. Average Depth of Knowledge (DOK) by Grade: Language Arts

	Grade 3	Grade 4	Grade 5	Grade 6	Grade 7	Grade 8	Grades 11-12
CCSS	2.00	2.16	2.31	2.37	2.51	2.51	2.68
PRDE	1.83	1.76	1.91	2.02	2.03	2.13	2.32

In October 2012, USDE officially certified PRDE’s standards and assessment system as being in compliance with ESEA standards and assessment requirements (see letter attached). Thus, Puerto Rico complies with all statutory and regulatory requirements. In addition, Puerto Rico is fully engaged in implementing a plan for the continuous increase in rigor of PRDE’s current assessment to prepare all students to thrive in their transition to higher studies or work and to meet the requirements of a “high-quality” assessment, as defined in the *ESEA Flexibility* policy document, by 2014-2015. PR is just now initiating a revision of both its content standards (“beginning in 2013-2014”) as well as development of HQAs (TAC “began” discussion regarding new assessments in June ’13).

¹ This metric was calculated in the following way: expert panelists used Depth of Knowledge rubrics based on the Norman Webb (1997) model ranging from 1 (the least cognitively complex) to 3 (the cognitive complex).

In the 2012-2013 school year, PRDE initiated the processes necessary to be able to field test constructed response items. The initial aspects of this work involved 1) developing an approach that was compliant with the HQA ESEA Flexibility document and 2) working with a vendor to develop a field test item for each assessed grade level that represented a high DOK aligned and was also aligned with the CCSS. Field test items will be piloted during the 2013-2014 and 2014-2015 school years in. Once the piloted items are operational, PRDE will continue developing and field testing new items to further increase the rigor of our assessment system. Related to future field testing, it should be noted that PRDE's efforts **will also involve teaching students how to respond to new types of prompts and assessment items.**

Only those items that are found to be reliable and valid will be included in/used as part of PRDE's assessment system. To ensure that only valid and reliable items are included in PRDE's assessment system, PRDE will work with the vendor and ensure that risks associated with poor assessment quality are addressed. Mitigation actions in this area will include ensuring that new items are pilot tested and technical issues related to poor item performance are addressed. Specific examples of these efforts include holding quarterly review meetings with the vendor to assess item quality and requesting that the vendor provide a summary report of all item quality findings. PRDE will continue this practice until the new high-quality assessments are completed. The new high quality assessments are scheduled to be completed and administered in the 2014-15 school year, although PRDE will continue to build upon the high quality of its current system in subsequent years, as well. It should be noted that while PRDE will continue to field test items in accordance with the test development blueprint, PRDE does not intend to include field test items in accountability determinations.

To reiterate, PRDE will engage in necessary field testing and related test development practices to ensure that the new high-quality assessments are operational in 2014-15. In addition, PRDE remains committed to continued development of items that improve the quality and rigor of its State assessments and will retain its current practice of embedding field test items in every operational form. PRDE expects to engage in a process of continuous improvement that may also involve stand-alone field testing of new items, just as we are in fall 2014, in subsequent years. This effort will guarantee that PRDE's item bank continuously meets the rigor of a High Quality Assessment aligned with the CCSS. Although field testing of possible new items will continue to take place once the new assessment is fully operational, field test items will not be used in accountability determinations.

PRDE has been working in the development of a growth model to measure students' academic achievement longitudinally. The growth model will be used to identify the academic priorities for each student and select the most rigorous and effective academic interventions. It will also be used to evidence how PRDE is ensuring that all students are gaining access to and learning content aligned with its standards.

Specifically, a growth model will be implemented for Spanish and mathematics in grades 4 through 8 and 11 that is consistent with the current PPAA and PPEA assessment systems. Information about growth models used in other states was gathered in August 2012 and options that might be appropriate for Puerto Rico were discussed with the Technical Advisory Committee during the September 2012 meeting. After considering the options and the nature of the Puerto Rico PPAA and PPEA assessments, the Technical Advisory Committee recommended a Transition Matrix model of growth. Data from the 2011-2012 and 2012-2013 administrations of the Puerto Rico assessments were then used to construct and analyze the characteristics of the Transition Matrix model. A major

advantage of the Transition Matrix approach is that it can be applied with the PPEA as well as the PPAA assessment. It is anticipated that student growth information for Spanish and mathematics in grades 4 through 8 will be available for the 2013-2014 reporting period for all schools including SIG/Priority Schools. PRDE will continue to work with technical experts and our TAC to determine how it can expand the use of a growth model to allow for its use with all grades and subject areas. Due to practical limitations, short term efforts will focus on developing and testing a model for using a growth model with tested grades and subject areas.

The spring 2012 administration will serve as the base year for the growth model. A general timeline for the development and implementation of the growth model is shown below.

Key milestones or Activities	Detailed Timeline	Party or Parties Responsible
Information about growth models gathered	August 2012	Standards & Assessment Unit; external vendor
Growth model options discussed with the Technical Advisory Committee; selection of Transition Matrix	September 2012	Standards & Assessment Unit; external vendor
Data from the 2011-2012 and 2012-2013 school-years used to develop the Transition Matrix	October 2012-June 2013	Standards & Assessment Unit; external vendor
Growth scores incorporated into the scoring and reporting systems	January-June 2013	Standards & Assessment Unit; Statistics Division
Growth results for Spanish and Mathematics reported	Beginning on 2013-2014	Statistics Division

The alternative assessment, PPEA, does not use a total raw or scale score but rather reports student results as a pattern of ratings across the dimensions of Progress, Performance, and Complexity. The possible score patterns were classified into performance levels during the 2009 standard setting meeting. The Transition Matrix approach is applied to the PPEA by further assigning the score patterns to sub-proficiency levels. With the integration of a growth model and the approval of PRDE's high quality assessment, PRDE complies with option B of the Principle 1.

The following table shows the timeline for the potential revision of standards aligned with the assessments.

Key milestones or activities	Detailed timeline	Party or parties responsible
RFP for standards review; review process begins	2013-2014 school year	Standards & Assessment Unit; OFA; Auxiliary Secretary of Academic Services
PPAA administration	April 2013	Vendor and Standards & Assessment Unit

RFP for developing formative evaluation for the non-tested grades and subjects; development of formative assessments begins	2013-2014 school year	Standards & Assessment Unit; OFA; Auxiliary Secretary of Academic Services
RFP for developing a PPAA test aligned with the revised standards	2013-2014 school year	Standards & Assessment Unit; OFA; Auxiliary Secretary of Academic Services
PPAA administration	April 2014	Vendor and Standards & Assessment Unit
PPAA administration and field test test new items for revised standards	April 2015	Vendor and Standards & Assessment Unit
Implementation of the new formative assessment for the non-tested subject and grades	2015-2016 school year	Vendor and Standards & Assessment Unit
New high-quality assessment aligned to PRDE's CCR standards will be administered"	April 2016	Vendor and Standards & Assessment Unit

Note: PRDE has made the decision to adopt new standards.

University of Puerto Rico Alignment Analysis

The University of Puerto Rico (UPR) is the only public 4 year degree university in Puerto Rico. The system consists of 11 campuses across the island and has approximately 62,000 students and over 5,000 faculty members. In December 2011, we collaborated with the UPR system to assess the alignment between the mathematics, science, Spanish language arts, and English standards adopted in 2007 for grades 10 and 11 with the knowledge and skills needed to succeed during the freshman year in college. (Additional information is included in the Addendum “ Certification Document from the Universidad de Puerto Rico”) Specifically, this analysis was conducted by UPR’s two main campuses which are recognized for its rigorous curriculum and high standards. In order to analyze the alignment and ensure college and career readiness, a team of 15-20 well respected professors from the UPR Mayaguez and UPR Río Piedras, compared PRDE grade-level expectations against the objectives outlined in their first year syllabus for pre-calculus, general biology, general chemistry, English and Spanish. The findings of this analysis indicate that high school students who master the 2007 content standards and grade-level expectations will not need remedial courses during their freshman year in college (see attachment 5).

Standards-based Instruction and Professional Development

Although the 2007 content standards are rigorous and have met the USDE peer review requirements, teachers have had challenges implementing these standards in their daily instruction. PRDE has supported, and continues to support, teachers to ensure the alignment of their daily plans with these rigorous standards. PRDE used a recent study of the links between classroom instruction and PRDE content standards conducted during spring 2010 to inform the development of its support. This study found that not all teachers have a mastery level understanding of their content area and teachers usually attempt to focus their instruction on the standards they find to be the most important, resulting in lack of consistency in instructional emphasis on key concepts across the island. Based on the results of the study, PRDE has decided to provide teachers with more consistent and effective island-wide training on how to translate standards into comprehensive instruction.

PRDE is also using findings from a consequential validity study during spring 2011 to inform the development of the supports it provides to teachers. Based on the results of the 2011 study, PRDE is providing technical assistance to help teachers feel prepared to implement standards-based instruction. PRDE' support in this area also focuses on helping teachers develop a deep understanding of the academic content and skills reflected in the standards and grade-level expectations.

Curriculum and Professional Development

PRDE is committed to provide teachers with the support they need to improve standard based instruction and ensure that all students in Puerto Rico have access to high-quality curriculum materials. PRDE developed supporting curriculum materials for grades K-12 for Spanish, Mathematics, Sciences and English as a Second Language using Understanding by Design to support standards-based instruction and the professional development of teachers. These efforts were developed and implemented in several phases. During the initial phase the following core documents were created:

- Vertical Alignment
- Scope and Sequence of Content per grade and class (k-12)
- Curriculum sequence calendars and curricular maps for grades 4th – 8th including all components of the curriculum
- PRDE normative documents
- Successful practices with scientific evidence

Next, a pilot study was conducted in six schools from different regions. Given the positive results of the pilot study, PRDE developed curricular maps for K-3 and 9-12. Over 300 district academic facilitators from all the regions of Puerto Rico were trained in the use of the new materials and the scope of the new normative.

Phase One: 2010-2011

Phase 1 of the curriculum project occurred during the 2010-2011 school year. The achievements during this phase included: creation of a K-12 scope and sequence that streamlined the content area standards, eliminating redundancy and introducing a spiraling approach to instruction that focuses on vertical alignment; and the development of standard-based grade level curriculum frameworks and pacing guides in Spanish language arts (SLA), English as a second language (ESL), mathematics, and science for grades 4-8.

A curriculum and professional development stakeholder committee was developed, in which designated teacher leaders from Puerto Rico collaborated and consulted with curriculum writers to refine the curriculum frameworks and associated materials during March and April 2011. This committee took responsibility for ensuring the development and implementation of the outlined plans for curriculum and professional development were in alignment with the Department's vision and goals.

Also, a pilot professional development boot camp was established for selected teachers in grades 4-8 representing each of the seven regions in Puerto Rico. The boot camp aimed to address standards-based curriculum and instructional support in two main areas: 1) overview and interpretation of

content area standards; and 2) overview of curriculum maps and introduction of standards-based instruction, including best practices for content area instruction. A boot camp work session took place over four days in June 2011 to present draft curriculum and professional development materials to about 36 teacher leaders from each of the six pilot schools. A full-scale boot camp took place over two days in October 2011 for approximately 65 content area teachers from the six pilot schools to be presented with the final curriculum maps and supplemental materials with the expectation that teachers would return to their schools and implement the newly acquired curriculum frameworks during the 2011-2012 school year.

The net effect of these efforts advance PRDE's effort of implementing college- and career-ready standards statewide. PRDE's progress in this area improved opportunities for all students, including English Learners, students with disabilities, and low-achieving students to gain access to and learn content aligned with PRDE's standards.

Phase Two: 2011-2012

Phase 2 of the curriculum project occurred during the 2011-2012 school year. This phase included the development of grade level curriculum frameworks and pacing guides in grades K-3 and 9 in SLA, ESL, mathematics, and science, and for core content courses at the high school level; involvement of key stakeholders in the planning and development process; and a system for building capacity among teachers and administrators by encouraging a deeper understanding of standards-based instruction.

Similar to the development of curriculum materials for grades 4-8, a stakeholder committee composed of several teacher leaders from all content areas served as collaborators in this work and ensured the development and implementation of the outlined plans for curriculum and professional development were well aligned with PRDE's vision and goals.

In PRDE's commitment to continue building capacity across the island, a full scale professional development boot camp was held in June 2012 for over 300 academic facilitators representing each one of the seven regions in Puerto Rico. The purpose of this boot camp was to provide the academic facilitators with an overview of the different content areas curriculum maps and introduction of standards-based instruction, including best practices for content area instruction for grades K-3 and 9-12. The academic facilitators were presented with standards-based assessment strategies that are aligned with the curriculum maps and shared ideas with colleagues about how to use the curriculum tools and strategies in the classroom.

The academic facilitators have been key to PRDE's efforts in the wide-scale implementation of the curricula across the island during the 2012-2013 school year. For example, during the summer of 2012 we asked all school districts to develop a work plan for the implementation of the curriculum materials for all schools including training for school directors, academic teachers, and special education teachers. School directors received a curriculum workshop on July 2012 and teachers received their curriculum workshop on September 2012. The Auxiliary Secretary of Academic Services also trained the program directors for the four core content areas and other non-tested subject areas. The program directors from the core content areas will disseminate the curriculum materials to their teachers while the Auxiliary Secretary of Academic Services made a commitment to revise the standards for non-tested subject areas and develop aligned curriculum materials for these.

Curriculum materials were created to support teachers in improving standard-based instruction for all

students, including student subgroups. PRDE's curriculum materials integrate our rigorous standards in vertical (K-12) and horizontal (all subjects) alignment with clear growth expectation for students with disabilities. As the pilot developed, it became apparent that the materials and training needed to be better aligned with teachers' specific needs. For instance, teachers found it difficult to integrate the materials into their everyday practice due to lack of resources and content challenges. Additionally, since PRDE's current policies establish that the use of the new curricular materials is optional, teachers and other PRDE's academic support staff did not feel compelled to take concrete steps to overcome any barriers they faced in the implementation of the new curricular materials. See details below regarding when the use of these materials will be required. Hence, improved standard-based instruction and access to high-quality curricular materials was hindered. PRDE is committed to engaging in continuous improvement and will use these learning experiences to inform future workshops and efforts to develop new materials.

Current Efforts

PRDE is taking several steps to eliminate barriers and support teachers in the transition to standard-based instruction and high-quality curriculum materials.

Policies and Procedures: The development of policies, procedures, strategies, professional training and coaching to support personnel will be the primary tool for effective teaching based on PRDE's rigorous standards. First, the Standards and Assessment Unit and the Office of the Undersecretary of Academic Affairs will lead an effort to improve teacher training with an eye for promoting teachers' understanding of the curricular materials and their use in the classroom. Specifically, the Standards and Assessment Unit, in coordination with all the Directors for Academic Programs, has formed working groups by academic subject to evaluate structural and content barriers that may be hindering appropriate use of the materials. Academic facilitators, teachers and other members of the educational community are part of the working groups. PRDE will issue a *Carta Circular de Planificación de la Enseñanza* (circular letter) in September 2013 to communicate to all school directors that implementation of the curriculum is mandatory.

Professional Development: All PRDE's professional development activities and initiatives are guided by two documents, *Puerto Rico's Professional Standards for Teachers* and the *Profile of the School Director in the Puerto Rico Department of Education*. These documents consist of the standards for effective teaching and leading that promote student learning and enhance professional practices. They define what high quality teaching and leading should look like in all PRDE's K-12 schools. As a rule, all professional development activities are planned, designed and structured to provide continuous opportunities to master content, strategies and the methodologies needed to improve student achievement as well as follow up and evaluation of the application of the acquired knowledge.

All PRDE teachers and directors are required to attend mandatory system-wide professional development activities. The system-wide professional development efforts provide teachers with supports related to the implementation of the curriculum and are designed to help teachers 1) feel prepared to implement standards-based instruction and 2) develop a deep understanding of the academic content and skills reflected in the standards and grade-level expectations. As indicated above PRDE will issue a *Carta Circular de Planificación de la Enseñanza* (circular letter) in September 2013 to communicate to all school directors that implementation of the curriculum is mandatory.

Presently, all PRDE schools have a requirement that 10% of their school budget be devoted to professional development. This professional development is documented through the CSP process and is aligned to school-specific needs. PRDE will monitor to ensure that teachers and school directors consider the document outlining PRDE's expectation for the performance and ongoing professional development of educators in its system (referred to locally as "professional standards" in the development of school-level professional development plans. PRDE will also monitor to ensure that this professional development also aligns with a school's overall needs, the needs of particular subgroups, the proposed school improvement interventions and any other professional development needs determined based on evaluations of teachers' professional performance. professional standards in their professional development Intervention Plans. Additional information on professional standards also appears on pages 142-148.,

Additional Professional Development In Support of Principle 2

The Standards and Assessment Unit and the Academic Program Directors are working together with the district academic facilitators and the personnel in charge at the districts to make sure all relevant personnel is properly trained and can provide professional training and support to teachers. They are working with its external providers to develop a comprehensive system of professional development targeting implementation of PRDE's curricula island-wide. The key components of the plan are:

- Island-wide implementation of professional development supports beginning in October 2013;
- Tiered implementation to target the SIG, priority, and focus schools in a more intense manner:
 - SIG and priority schools will have on-site content-specific coaches that are assigned to no more than two schools each and will establish Communities of Practice to support schoolwide changes;
 - Focus schools will have on-site content-specific coaches that are assigned to no more than three schools each and will establish Communities of Practice to support schoolwide changes;
 - All district content coordinators (District Academic Facilitators, District and Municipal Special Education Academic Facilitators, Academic Auxiliary Superintendents) will be trained to provide supports at the school- and teacher-level in support of the coaches and to schools other than the SIG, priority, and focus schools;
 - All educators will have on-demand access to a series of on-line professional development modules that target key instructional aspects of the curricula.

For the SIG, priority, and focus schools, professional development will be tailored to meet the specific needs of the school and the individual teachers within the school. Some professional development will include school-level workshops, but the coaches will work on an on-going basis to support continuous implementation. PRDE is not relying on a workshop model as we have found this to be ineffective in changing classroom practices.

Future Efforts

During the 2013-2014 school year, each school district will focus its efforts in providing technical assistance to support teachers in their professional development, keeping the rigor of the standards and expectations-based education. Each school district will prepare technical assistance calendars to

assist teachers and directors in their efforts to attain growth in the academic achievement of our students. PRDE expects to evidence a significant growth in academic achievements and identify validated strategies to sustain academic progress by the 2015-2016 school year.

Among the training strategies that will be promoted is the development of effective learning communities. This is similar to the approach used in Phase I of the curricular maps pilot program which allowed teachers to share their experiences, lesson learned and successful practices with other schools within their districts. Other strategies that will be implemented are demo classes and the use of educational videos to support the training of the curricular materials. PRDE will integrate web technology as a collaboration tool to answer frequently asked questions from all members of the educational community. Additionally, during the annual Comprehensive School Plan orientation, school directors will receive information on how to integrate Understanding by Design strategies in their teacher professional development efforts. Understanding by Design, a scientifically based educational strategy, will be a required element for each school's Improvement Action Plans.

Starting in the 2013-2014 school year, each school district will focus its efforts in providing technical assistance to support teachers in their professional development, keeping the rigor of the standards and expectations-based education. Each school district will prepare technical assistance calendars to assist teachers and directors in their efforts to attain growth in the academic achievement of our students.

Key Milestones/ Activities	Detailed Timeline	Party/Parties Responsible	Evidence	Resources
<i>Carta Circular de Planificación de la Enseñanza</i> will establish as mandatory the implementation of PRDE's curriculum, use of curricular materials, participation in PD activities, and evaluation.	September 2013	Office of the Undersecretary of Academic Affairs	Copy of the letter	Staff time
Island-wide implementation of professional supports (on-site coaches for Priority and Focus Schools, establishment of Communities of Practice; ongoing district level support for other schools)	2013-2014	Office of the Undersecretary of Academic Affairs/OFA /external providers/ district level staff	Coaches school-contact sheets, workshops and meetings agendas, materials shared	PRDE staff and external providers
Meetings with teacher and director associations to raise awareness about the need to use curricular materials, gather feedback about new/emerging barriers teachers face, discuss new policy requirements and highlight and gather feedback on professional development offerings and needs	2013-2014	Office of the Secretary/ Office of the Undersecretary of Academic Affairs	Copy of meeting agenda and signing sheets, summary of meetings notes and feedback	Staff time
Meetings with IHE and other stakeholders to share information	2013-2014	Office of the Undersecretary	Copy of meetings	Staff time

gathered from teacher meetings, gain expert advice and guidance to inform future efforts, and ensure a feedback loop to conversations regarding any changes to the teacher preparation programs and the alignment of the PRDE curriculum with IHE's performance expectations		of Academic Affairs	agenda and signing sheets, summary of meetings notes and feedback	
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Additional Curriculum and Professional Development Supports for Teachers of Students with Disabilities

One fifth of the student population in Puerto Rico has been identified as students with disabilities. PRDE is committed to promoting the academic achievement of all students including students with disabilities. PRDE's goal is that all students achieve mastery of the curriculum so that each graduates from high school with the skills necessary to pursue a college education, occupational training or enter the world of work.

The curricula that we have developed already include means for differentiating instruction for students with disabilities. PRDE's curricular maps establish performance tasks with alternative strategies for teachers to be used with students with disabilities. PRDE has only one curriculum for each content area and that curriculum applies to all students. Professional development activities highlight aspects of the curricula so that every classroom teacher has a repertoire of tools for adjusting standards-based instruction to address every student's needs.

Alternative Assessments

Furthermore, PRDE is considering adopting the National Center and State Collaborative (NCSC) alternate assessment system that is currently being developed by the University of Minnesota under a grant from the Office of Special Education Programs at the Department. This would further enrich our approach to ensuring that all students are held to a common set of high academic expectations. The system includes curriculum resources aligned with the Common Core State Standards.

This system is not presently being developed in Spanish. PRDE recognizes that there is significant cost associated with the translation of the NCSC assessment into Spanish and does not have the fiscal resources to cover the full expense. However, PRDE's experience with the WIDA SALSA grant suggests to PRDE that other NCSC states will be interested in creating a Spanish-language version of this system and we could mutually-benefit from collaboration with other entities on Spanish versions of the assessment and the curriculum. Additionally, PRDE will consider the possibility of contributing some of its 1116 funds to this endeavor in the near future and look to States such as California and New Mexico to identify effective strategies for transitioning to this new assessment.

PRDE's adoption of the NCSC alternate assessment system will, thus, be contingent on 1) the degree to which the NCSC assessment is proven to be a valid assessment of PRDE's enacted curriculum [describe when PRDE would conduct such an analysis], 2) the availability of a validated Spanish version of the assessment, and 3) the availability of funds to support implementation. While Puerto Rico's Secretary of Education has the authority to execute the formal adoption of the NCSC alternate

assessments, this process involves various stakeholders for successful adoption and implementation (including the Governor, the Office of the Undersecretary of Academic Affairs, the Standards and Assessment Unit, the Associate Secretary for Special Education, teachers and their representatives, school directors, and families and advocates of students with special needs). Thus, stakeholder engagement will be central to the potential adoption of the NCSC alternate assessments. PRDE expects to make a final determination regarding the potential adoption of NCSC alternate assessment system by December 2013.

If PRDE decides not to adopt this assessment, it realizes that it will need to either develop its own alternate assessment or keep its current assessment. PRDE believes that the most realistic option will be to maintain its current process of using a portfolio. The portfolio will be based on the new college and career ready standards that will be adopted. The processes used to revise the PPEA would be modeled after the successful practices PRDE has used in the past (see pages 46, 58 and 60 for additional detail about the current PPEA).

PRDE's goal is to maximize these students access to the general curriculum by providing them with a high quality standard based instruction linked to the 2007 content standards and grade-level expectations and ensure that students will graduate from high school ready for college and careers. All students with disabilities must have access to the same curriculum as their peers, age appropriate materials, and an engaging academic experience.

Goal Setting

PRDE believes it must set high expectations for performance for our students with significant cognitive disabilities (approximately 1%) and they must have access to the curriculum based on the same content standards as their same grade peers. PRDE's alternate achievement standards reflect rigorous definitions of the knowledge and skills that students with significant cognitive disabilities must demonstrate to be considered proficient in academic domains for each grade level. PRDE's goal is to ensure that students develop depth and complexity in skills and knowledge as they move through successive grade levels. PRDE set the expectations that students with significant cognitive disabilities will become proficient with successively more challenging content over time.

PRDE is committed to developing special education teachers' skills to ensure that all students with disabilities, including those with significant cognitive disabilities, have access to and make progress in the general curriculum. In addition to the curriculum implementation and professional development supports described earlier in this section, every year PRDE provides in-depth training to districts and regional personnel to become thoroughly familiar with the procedures for developing the PPEA assessment portfolio, and providing students with sound instruction. PRDE also provide with professional development opportunities in areas such as content delivery and establishing academic goals in IEPs. In addition, teachers receive continuous support from their district's special education and academic facilitators. Special education facilitators conduct classroom visits and provide recommendations for teachers on strategies to improve their instruction and other areas of need. These classroom visits are a vehicle to provide one-on-one support and usually inform professional development for these teachers.

Professional Development

In PRDE's continuing efforts to provide teachers with resources and supports necessary to deliver high

quality standard-based instruction to students with significant cognitive disabilities, during spring 2011 we developed a series of modules to support the PPEA assessment training process and provide teachers with a tool to further incorporate best practices on the alignment of standards, instruction, and assessment. PPEA assessment training is provided annually. PRDE's main goal with these modules is to increase understanding of effective ways to provide instruction to students with significant cognitive disabilities to promote progress in all academic areas.

Teachers of students with disabilities receive direct support on academic content and instructional strategies from the Special Education Academic Facilitators. Regional and School District Units and the Associate Secretary for Special Education monitor all schools to ensure compliance with students with disabilities including attending to their educational, social and emotional needs.

Transition Planning

PRDE is working with district academic facilitators and teachers to set high expectation for students with disabilities in order to prepare them for college or work. PRDE's transition program at the school level provides orientation to teachers and students about services available in the community to help students with disabilities for the transition to postsecondary studies or work (for example, partners who work with students to help them transition via apprenticeships). Teachers impacting students with disabilities who are 16 and older are also annually trained in the transition process to adult living. Training includes: Academic Skills, Independent Living, Employment and Training Experiences. Teachers meet with each student's Programming and Placement Committee (COMPU in Spanish) - composed of the student, his/her parents/guardian, regular and special education teachers, school director, the social worker and a representative of the Vocational Rehabilitation Program- to develop an individualized educational plan. Each individualized plan takes into account the student's Psychological and Impairment Evaluations together with the results of their Vocational Interest Inventory administered by the school counselors. Those students deemed eligible are then referred to the Vocational Rehabilitation Program for additional college- or career-related support. Additionally, the Associate Secretary for Special Education is revising the guidelines for Independent Living and Occupational Skill Development programs to adjust them to contemporary challenges facing today's students.

Additional Curriculum and Professional Development Supports for Teachers of Limited Spanish Proficiency Students

In Puerto Rico, Spanish is the language of instruction, as well as the predominant language used in commerce and social interaction. Limited Spanish proficiency (LSP) is the student group in Puerto Rico that parallels the English learner or LEP student group in mainland states. It is PRDE's expectation that the LSP population achieves the same academic goals as regular students while becoming proficient in the Spanish language.

The curricula that we have developed already include means for differentiating instruction for LSP students. PRDE's curricular maps establish performance tasks with alternative strategies for teachers to be used with LSP students. Professional development activities highlight aspects of the curricula so that every classroom teachers has a repertoire of tools for adjusting standards-based instruction to address every student's needs.

Professional Development

Professional development is a key element in creating a strong system of support for teachers of LSP students. On a yearly basis, LSP teachers complete a self-evaluation that offers information to the Title III Program officials on topics for workshops and professional development academies. In addition to the curriculum implementation and professional development supports described earlier in this section, additional professional development opportunities specifically tailored to the needs of teachers of LSP students are scheduled throughout the school year (see table below). It is expected that through professional development activities and the use of curriculum materials aligned to the standards and grade level expectations teachers will improve classroom instruction and help LSP students achieve higher academic outcomes.

Additionally, academic and support schools staff will receive ongoing training to adequately address the needs and rights of LSP students. Although there are few schools participating in the Title III Program, all teachers, school directors and counselors must understand the Program and move swiftly, as soon as enrollment of a student that meets the criteria is established, to follow the appropriate procedure outlined in the official memorandum of May 7th 2013.

School District and Regional Units, and the Immigrants and LSP Program monitor all schools to ensure compliance with LSP students including attending to their educational, social and emotional needs. Teachers with LSP students are supported by Spanish District Academic Facilitators. LSP teachers will soon receive additional support as PRDE is in the process of hiring LSP Academic Facilitators proficient in at least one of the languages of the LSP population to provide support to schools and in the classroom (a call for applications is scheduled to be posted in July 2013).

In addition to the system-wide professional development and the customized professional development that schools outline in their CSP, the Title III Program has scheduled the following professional development activities for all schools. Teachers, school directors and counselors will be required to attend. Among the topics that will be covered are: Legal and Constitutional Aspects of the Title III Program, Findings in Recent Monitoring Evaluations that Require Immediate Corrective Action, and School and Individual Work Plans for Participating Students. PRDE recognized the time commitment required by this professional development and will make a concerted effort to incorporate these training topics into existing workshop so as to not overly burden teachers with separate professional development activities.

Instructional Practices

In addition to PRDE's singular curriculum, research-based strategies are being used to improve the quality of instruction in the development of the socio-linguistic skills of the Spanish language addressing the particular needs of the LSP and immigrant student population. These strategies include:

- Differentiated curriculum – PRDE has implemented the use of complementary instructional materials that meet the standards for teaching Spanish as a Second Language (i.e., “Viva el Español”, “El Planeta de los Verbos”) and provide additional support for LSP students (i.e., Rosetta Stone language software)
- Reciprocal instruction (cooperative and peer-learning strategies)
- The classroom as a learning lab – Schools with LSP students provide additional individualized and/or group learning time with a qualified Title I teacher to support regular classroom learning

- The school library as a reading and investigation center – Schools with LSP students provide additional individualized and/or group learning time with the differentiated curriculum and the support of the school library resources and staff

During the 2012-2013 academic year, the Limited Spanish Proficiency and Immigrants Program developed the project *Andamiaje Conceptual Tecnológico para Adquirir el Español como Segundo Idioma* (PACTA-L2). The goal of the project is to assist LSP students in reaching proficiency in speaking, writing, reading and comprehending Spanish fostering academic achievement in all subject matters. To achieve this goal, LSP Support Centers have been established in 87 schools where LSP enrollment is highest. The Centers provide after-school academic support integrating technology to the Spanish acquisition process and providing high-quality, systematic and continuous professional development to LSP teachers. For the 2013-2014, additional second-language learning strategies will be included integrating fine arts, sports and technology.

Title III LSP Program / Staff and Community Training		
Key milestones or activities	Detailed timeline	Party or parties responsible
Orientations for School Directors	February-March 2013	Title III Program Staff
Workshops for teachers and parents	April-September 2013	Title III Program Staff
Academies and multi-day seminars for teachers, directors and guidance counselors	March-September 2013	Title III Program Staff

Current academic assessments procedures integrate appropriate accommodations as established in PRDE's Accommodations Manual (2004). Additionally, the Title III Program has developed a Procedures Manual which includes: a revised Circular Letter, K-12 Standards for Spanish as a Second Language, Recommendations for the instruction of Spanish as a Second Language, Model of Rigor Document, ACE LERA and the series "Viva el Español". PRDE provides appropriate technical assistance to ensure that all LSP teachers have a complete understanding of these accommodations.

Future Efforts

To increase PRDE's efforts in improving the quality of instruction for Spanish language learners under Title III of the NCLB, in 2010 we submitted a letter of intent to participate in the development of Spanish Language Proficiency (SLP) standards and the accompanying assessment through a U.S. Department of Education Enhanced Assessment Grant (EAG). The World-Class Instructional Design and Assessment (WIDA) consortium was awarded the funding through the EAG program to develop the SLP standards and aligned assessments. The PRDE joined WIDA with three other states/entities to develop Spanish Language Proficiency Standards and the accompanying assessment under the Spanish Academic Language Standards and Assessment (SALSA) project. To ensure that the needs of our LSP students are met, we identified three LSP teachers to serve as representatives during this process and to participate in important meetings. In summer 2012, we signed a new memorandum of understanding (MOU) with WIDA to continue as a collaborative partner on the EAG grant.

The new standards are scheduled to be released in 2013 and the operational form of the PODER (*Prueba Óptima del Desarrollo del Español Realizado*) test for kindergarten will be released in August 2013. Operational test forms for grades 1-2 will be available in August 2014 and for grades 3-5 in August 2015. Puerto Rico participated during the validation process as well as the bias and sensitivity reviews for Kindergarten items in September 2012. PRDE has actively participated in several activities towards the development of LSP standards spearheaded by WIDA. PRDE's Standards and Assessment Unit director was part of the team who drafted the "Definiciones de Desempeño de los Estándares" document at the Santa Fe, NM, meeting. PRDE teachers and academic program directors have also been involved in several efforts relating to the PODER and PUEDE assessments, for example, the Bias and Sensitivity and Content Review and item writing process. Most recently, the Standards and Assessment Unit director, the K-3 program director and two teachers participated in the Standards Setting meeting where they shared with WIDA PRDE's plans for the implementation of the new standards. At that meeting WIDA informed that the new standards will be published by September 2013. PRDE is in ongoing communication with its USDE Title III coordinator about the administration of an aligned assessment. Since there is no assessment aligned with WIDA standards at this time, PRDE evaluated LAS Link (version C) – which is aligned to the CCSS – and will be administering LAS Link (version C) during the current school year, as approved by USDE.

[Implementation of new SLP standards]

To support the college- and career-transition of this population and support teachers in their efforts, PRDE is hiring part-time school counselors for each Title III participating school. The process to hire part-time counselors began in June 2013. PRDE expects that the hiring process will be finalized and the new counselors will be offering services before the end of the current semester. PRDE is inaugurating four Immigrant Support Services Centers in elementary and middle schools during the summer of 2013. Four additional centers will be opened in August 2013. The centers will offer after-school services to the immigrant and LSP students and parents including college and career counseling. These services are offered to supplement what is already offered at schools during the school day. School counselors will be in charge of evaluating the occupational interests of each immigrant student, among other areas, as well as providing individualized and continuous follow up of academic and administrative processes necessary for their transition.

Once PRDE's Flexibility Waiver is approved, PRDE will work with US Department of Education staff to modify timelines as needed to ensure compliance with ESEA Flexibility requirements. Specific dates cannot be provided because the timeline for approval of the WIDA Standards have not been published. WIDA has announced that the LSP standards will be in September 2013.

In addition to the separate activities listed below, LSP teachers will be invited to all PRDE-wide events where standards, professional development, CSP, school improvement and accountability are discussed. Thus, communication and the timeline for coordinating these meetings is included under the larger timeline/plan for the rollout of standards and related professional development. Leadership at the Central level of PRDE's LSP program will be responsible for preparing the relevant information and materials for LSP teachers. This content will be planned at the Central level in coordination with all relevant academic staff. Oversight, technical assistance and monitoring of the implementation of these efforts will be subsumed within existing management practices executed by staff in the Office of Academic Affairs

- Month 1: onboarding of new LSP hires, communication about roles and responsibilities
- Month 3: focus group meeting with LSP hires to address questions and concerns about standards, school improvement efforts, coordination of resources to schools within each district
- Month 5: second focus group with similar content, agenda and purpose
- Month 7: third focus group with similar content, agenda and purpose
- Month 8: PRDE central level meeting to discuss benefits and challenges with new LSP program components

The LSP program directors are working to ensure parents of LSP students are involved in learning process. These efforts include holding workshops and orientations that address 1) assessment results that determine student needs and services, 2) how parents can support learning in the home, 3) results of student outcomes and other topics related to student progress. Direct outreach to LSP parents is coordinated by the Title III Part A Program Coordinators and School Districts Academic Facilitators. Title III Part A Program Coordinators are organizing a series of regional LSP parents' workshops on educational and students support strategies to be held from June to August 2013.

Advanced Placement Courses

It is PRDE's goal to provide high performing students who wish to pursue a college career with a variety of academic experiences. As such, we offer these high school students advanced placement (AP) courses in the subject areas of Spanish, English and pre-calculus in grade 12. During the 2011-2012 school year, 16% of students enrolled in grade 12 took at least one of these AP courses. In order for students to participate in these AP courses, they must score proficient or advanced on the annual state assessment (the PPAA) and have a minimum performance score of 85% in the subject of the AP course they wish to take. These courses help students to more easily transition to the world of postsecondary education and provide students with opportunities to obtain college credit by passing a standardized test developed by the College Board in each one of the AP subjects they are enrolled.

Indicators of College and Career Readiness

As part of PRDE's commitment to promote college participation for all students, including SWDs and LSP students, PRDE is working towards annually publishing both the college going and college credit accumulation rates for each identified subgroup that has at least 30 students in each high school in Puerto Rico. The development of the State Longitudinal Data System represents a step forward towards achieving this goal. The contract initiation date will be September 13, 2013. The contract completion date will be June 30, 2015.

Relationships between the PRDE and Institutions of Higher Education in Puerto Rico

PRDE strongly believes that having certified, highly effective teachers and school directors in every school is crucial to improving student outcomes. Moreover, it is critical that teacher preparation programs fully prepare new teachers and school directors with a deep understanding of the college and career ready standards and the grade level expectations.

PRDE recognizes the needs to establish a long-term plan to continuously review and revise our curriculum, standards and assessments in order to maintain close alignment with college- and career level expectations. Thus, PRDE will work closely with all IHE's in the development of separate but interrelated initiatives to promote the graduation of high quality teachers and directors, and make

sure PRDE's students succeed in college and their career paths. More specifically, PRDE will work with IHE towards the following goals: 1) a revision of IHE's admission requirements for teacher preparation programs to attract stronger candidates; 2) a revision of the skills and content knowledge candidates must master before they graduate to better integrate PRDE's standards; and 3) a revision of the related assessment of student performance towards achieving the standards. PRDE will also look into working with IHE and an independent vendor to develop a statewide curriculum for integrating the PR standards into pre-service teacher preparation.

Teacher and Director Preparation Programs

Consistent with U.S. Department of Education, *Our Future, Our Teachers: The Obama Administration's Plan for Teacher Education Reform and Improvement*, PRDE will begin to address teacher preparation programs' accountability for teacher preparedness by taking the following steps:

1. During the 2013-2014 school year, PRDE will initiate procedures to provide IHEs with data linking teacher program graduates to PRDE's students outcomes.
2. PRDE will revise its "Guidelines for the Classification of Teacher Preparation Programs in Puerto Rico" to integrate more rigorous standards for the classification of programs. PRDE will work with the 33 teacher preparation programs (public and private) in developing regulations and guidelines that include the best measures of program effectiveness beyond the pass rates on teacher certification tests. The revision will ensure alignment with state standards and professional teaching standards before the next classification in 2014.
3. PRDE will study the possibility of working with a vendor to develop a statewide curriculum that integrates PRDE standards into pre-service teacher preparation.
4. PRDE will advocate for a revision of IHE's admissions and graduation requirements for teacher preparation programs to ensure that candidates master PRDE content and standards before they graduate.
5. PRDE's Teacher's Professional Development Institute (*Instituto para el Desarrollo Profesional del Maestro InDePM*) and the Administrative Capacity and School Advisory Institute (*Instituto de Capacitación Administrativa y Asesoramiento a Escuelas ICAAE*) will development guidelines for new teacher and school director induction programs at the district level.

The Teacher Certification Test in Puerto Rico, PCMAS (*Pruebas para la Certificación de Maestros en Puerto Rico*), is revised every five years and is up for revision next year. PRDE will work with IHEs and the College Board to set a timeline for a revision of the test aiming for a more rigorous alignment with college and career ready state standards. PRDE will require that teacher certification be granted on the basis of teachers' understanding of college- and career-ready standards, performance, and evidence of effectiveness in addition to the scores on the written tests.

A detailed timeline for all the described activities is presented below. Once PRDE's Flexibility Waiver is approved, PRDE will work with US Department of Education staff to modify timelines as needed to ensure compliance with ESEA Flexibility requirements.

Key Milestones/ Activities	Detailed Timeline	Party/Parties Responsible	Evidence	Resources	Significant Obstacles
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Meet with Deans of Education and/or presidents of the 33 teacher preparation programs to create a Teacher Preparation Steering Committee and subcommittees	Aug. – Oct. 2013	Office of the Secretary Office of the Undersecretary of Academic Affairs	Agenda, assistance sheets, minutes, collaboration agreements	Staff time	None
Steering committee's ongoing work sessions to discuss, analyze and develop appropriate benchmarks	Work sessions (Fall 2013) Results of discussions and analysis and benchmark development (Fall 2013-Spring 2014)	Office of the Secretary Office of the Undersecretary of Academic Affairs	Agenda, assistance sheets, minutes of meetings, benchmarks,	Staff time	None
Revision of entrance requirements for teacher preparation programs	Revisions (Fall 2014) Recommendations and final agreements (Spring 2015) Official policies and documents (Spring 2015) Implementation (Spring 2015)	Office of the Secretary Office of the Undersecretary of Academic Affairs	Agenda, assistance sheets, minutes, collaboration agreements Results of revisions and analysis, official documents and communications,	Staff time; Funding for technical assistance to IHE's for revision of entrance requirements	None
Revision of PRDE's teacher certification tests (PCMAS) (including collaboration with College Board)	Revisions (Fall 2014) Recommendations and final agreements (Spring 2015) Official policies and documents (Spring 2015) Implementation (Spring 2015)	Office of the Secretary Office of the Undersecretary of Academic Affairs	Agenda, assistance sheets, minutes, collaboration agreements Results of revisions and analysis, official documents and communications,	Staff time Funding for the revision of PCMAS	None

			RFP for teacher certification tests,		
Revision of the guidelines for the classification of teacher preparation programs in PR	Revisions (Fall 2014) Recommendations and final agreements (Spring 2015) Official policies and documents (Spring 2015) Implementation (Spring 2015)	Office of the Secretary Office of the Undersecretary of Academic Affairs Office of Federal Affairs (Title II Coordinator)	Agenda, assistance sheets, minutes, collaboration agreements Results of revisions and analysis, official documents and communications,	Staff time Funding for Guidelines for the Classification of Teacher Preparation Programs	Resistance of IHE's to new policies
Development of toolkit to aid IHE's alignment with PRDE standards	Fall 2013	Office of the Secretary Undersecretary of Academic Affairs Office of Federal Affairs	toolkits	Staff Time Funding for technical assistance and development of the toolkits.	None
Meet with appropriate PRDE personnel to initiate procedures that will enable the data linkage between teacher program graduates with student outcomes	Meeting(s) (Summer 2013) Final agreements (Summer 2013) Implementation of procedure (Spring 2014)	Office of the Undersecretary of Academic Affairs Auxiliary Secretary of Planning and Education Development Office of Federal Affairs	Agenda, assistance sheets, minutes, produced documents, policies and procedures in place	Staff time Funding for implementation of new or updated data systems	Technical issues with current systems being used
Alignment with College and Career Level Expectations					

The Office of the Undersecretary of Academic Affairs oversees collaboration efforts with IHE, and will continue communicating with all 33 teacher preparation programs island wide (public and private) to ensure the PRDE’s college and career ready standards are in line with first year university coursework. The University of Puerto Rico, the only four-year public university in Puerto Rico, has already determined that high school students who master content standards and grade level expectations will not need remedial courses during the first year of college (see attachment 5). PRDE will also ensure that all other IHEs assess the alignment between our curriculum and standards and the knowledge and skills our high school graduates need to succeed during their first year of college.

An advisory committee of university professors from public and private universities will be formed to work closely with PRDE in the development of a long-term plan for continuous review of PRDE’s curriculum, standards and assessments. Additionally, PRDE will begin conversations with industry and professional organizations representatives to review PRDE’s vocational programs in light of the highest career-level expectations.

A detailed timeline of activities to ensure alignment are described below

Key Milestones/ Activities	Detailed Timeline	Party/Partie s Responsible	Evidence	Resources	Significant Obstacles
Meet with IHE representatives to create a College- and Career-ready Standards Committee	August 2013	Office of the Undersecretary of Academic Affairs	Agenda, assistance sheets, minutes, collaboration agreements	Staff time	
work sessions to assess the alignment between PRDE’s college and career-ready standards with IHEs’ first year college expectations	Work sessions (Fall 2013) Results of discussions and analysis (Spring 2014) Recommendations and final agreements (Spring 2014)	Office of the Undersecretary of Academic Affairs; Standards & Assessments Unit	Agenda, assistance sheets, minutes of meetings, results of revisions and analysis, official documents and communications	Staff time	
Meet with IHE representatives to revise first-year teacher prep program curriculum to align with PRDE’s college- and career-ready standards	Revisions (Fall 2014) Recommendations and final agreements (Spring 2015) Official policies and documents	Office of the Secretary Office of the Undersecretary of Academic Affairs	Results of revisions and analysis, official documents and communications, RFP if vendor for the	Staff Time	Legislation may be needed to compel IHE’s to comply with PRDE’s new requirements

	(Spring 2015) Implementation (Spring 2015)		development of a statewide curriculum for integrating the standards into pre-service teacher preparation is needed		
Develop tools to aid alignment between IHEs and PRDE standards	Spring 2014	Office of the Undersecretary of Academic Affairs; Standards & Assessment Unit	Copy of materials	Funding for technical assistance and development of the toolkits if necessary	Technical issues with current systems being used

Initiatives to Increase College Preparedness

College Access Challenge Grant Program

The main goal of PRDE’s fourth year proposal for the College Access Challenge Grant was to strengthen and build alliances so as to sustain programs and expand emphasize the outreach activities for students who may be at risk of not enrolling in or completing college. The following descriptions reflect a sample of the activities we have been engaging in under this grant:

- Post-Secondary Orientation: In 2012, for the first time, UPR dedicated a week to motivating, informing, and helping prepare students for post-secondary education. To support this work, they provided school counselors with additional electronic tools so they can improve their guidance.
- Personal Roadmap to College: PRDE have developed and distributed more than 23,000 roadmaps to students, parents, counselors, teachers, and school directors to help prepare students and their families for the transition to college.
- Collaboration with ASPIRA and TRIO Programs: PRDE and UPR have been collaborating with the ASPIRA and TRIO programs to assist in their efforts to increase the participation of traditionally underserved students in post-secondary education.
- Summer Camps and Online Courses: A summer camp for post-secondary readiness was held in June of 2012 to assist students in gaining experience with university courses and prepare them for success on the AP tests they will take in the 2012-2013 school year. This initiative is another method for ensuring both a smooth transition from secondary to post-secondary education and helping students to recognize their post-secondary opportunities. These summer camps also utilized PRDE’s online courses that are geared toward assisting students in passing the AP exams.

1.C DEVELOP AND ADMINISTER ANNUAL, STATEWIDE, ALIGNED, HIGH-QUALITY ASSESSMENTS THAT MEASURE STUDENT GROWTH

Select the option that pertains to the SEA and provide evidence corresponding to the option selected.

<p>Option A</p> <p><input type="checkbox"/> The SEA is participating in one of the two State consortia that received a grant under the Race to the Top Assessment competition.</p> <p>i. Attach the State’s Memorandum of Understanding (MOU) under that competition. (Attachment 6)</p>	<p>Option B</p> <p><input checked="" type="checkbox"/> The SEA is not participating in either one of the two State consortia that received a grant under the Race to the Top Assessment competition, and has not yet developed or administered statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs.</p> <p>i. Provide the SEA’s plan to develop and administer annually, beginning no later than the 2014-2015 school year, statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs, as well as set academic achievement standards for those assessments.</p>	<p>Option C</p> <p><input type="checkbox"/> The SEA has developed and begun annually administering statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs.</p> <p>i. Attach evidence that the SEA has submitted these assessments and academic achievement standards to the Department for peer review or attach a timeline of when the SEA will submit the assessments and academic achievement standards to the Department for peer review. (Attachment 7)</p>
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Statewide Assessment System

The PRDE has developed a comprehensive statewide assessment system to meet NCLB requirements as well as to inform other local decisions. As other states have done, we have submitted evidence to the U.S. Department of Education (USDE) demonstrating PRDE’s compliance with the law’s mandates and the validity of our implemented standards and assessment systems for their intended purposes. In November 2011, we submitted the remaining evidence for the peer review process to the USDE,

demonstrating that the assessment system meets the rigorous USDE requirements. On October 2012, the PRDE received the USDE letter of approval certifying that we have substantially met the requirements and the compliance of our standards and assessment systems (see letter attached).

All students who attend public schools in grades 3-8 and grade 11 in Puerto Rico are assessed annually in Spanish language arts, English as a second language, and mathematics, through the *Pruebas Puertorriqueñas de Aprovechamiento Académico* (PPAA) or the *Pruebas Puertorriqueñas de Evaluación Alternativa* (PPEA), which were developed to align with PRDE's academic content standards and grade level expectations. In addition, all students who attend public schools in grades 4, 8, and 11 are assessed annually in science through either the PPAA or PPEA. The PPEA is PRDE's alternate assessment designed for students with significant cognitive disabilities who are unable to participate in the general assessment (PPAA), even with accommodations.

The new academic content standards took effect in school year 2008-2009. As a result, we set new academic achievement standards for the new PPAA tests. In August 2009, educators including experienced general education teachers representing mathematics, language arts, science and ESL content areas, and special education teachers from across Puerto Rico convened to set standards on all grades and subjects of the PPAA. The goal of this meeting was to set three cut scores for reporting performance in four levels: Below Basic, Basic, Proficient, and Advanced in testing grades for all tested content areas.

PRDE also developed performance level descriptors (PLDs) designed to describe the skills and abilities that students possess within each of the four performance levels for each tested subject and grade level. In addition to aligning with the PRDE academic content standards, the PLDs were crafted to capture measureable outcomes as reflected in the PPAA assessments. PRDE also commissioned an independent study to examine several questions related to the PLDs and current PPAA cut scores. In this study, panels of Puerto Rico teachers reviewed the PLDs for each grade and subject area and provided feedback about the extent to which each PLD:

1. conforms with the teachers' perceptions of the knowledge and skills of their actual students whose test scores fall into each performance level;
2. represents the knowledge and skills manifest in the items associated with each performance level;
3. compares with Puerto Rico's Content Standards and Expectations;
4. compares vertically across performance levels within each content area; and
5. compares across grade levels within each grade span.

The findings of this study suggest that the PLDs conform to the teachers' perceptions of the knowledge and skills of their actual students whose test scores fall into each performance level and represent the knowledge and skills in the items associated with each performance level. This evidence suggests that the cut scores do appropriately distinguish between the performance levels. Overall, the PLDs also compared well with Puerto Rico's Content Standards and Expectations, as well as across performance levels within each content area and grade span.

PPAA Alignment with PRDE's Content Standards and Grade-Level Expectations

PRDE's assessment system ensures coverage of the depth and breadth of PRDE's academic content standards and employs multiple approaches within specific grade and content combinations to meet

this goal. First, we developed test blueprints that ensure the selection of an aligned set of items for each test form. Second, we commissioned a study in 2010 to evaluate the extent to which the PPAA and its operational system have been designed to yield scores that reflect students' knowledge and skills in relation to academic expectations. This study evaluated alignment in terms of depth of knowledge (extent to which the complexity of knowledge required to correctly answer assessment items corresponds to the level of cognitive demand defined in the academic content standards), categorical concurrence (correspondence of items to standards), and domain concurrence (proportion of items that match content defined in the grade level standards as opposed to items that do not clearly match content defined in the grade-level standards).

Overall, the findings support a strong degree of alignment. At the test level, the alignment results were moderate to strong in 93% of the analyses. The most critical aspects of alignment, represented as categorical concurrence, DOK, and domain concurrence were moderate to strong for all grades. For example, results from the study indicated that the test blueprints reflect most of the content and DOK aspects of the content standards. For Spanish language arts, DOK results are moderate in grade 3 with a general increasing trend across subsequent grades, and for mathematics, DOK results are moderate at all grades. Findings for categorical concurrence indicated that for Spanish language arts, categorical concurrence is moderate across all grades. The moderate ratings are due in part to the absence of one standard (Oral Comprehension, present in all standards documents) from the test blueprints and the item ratings; for mathematics, categorical concurrence is moderate in grade 7 and strong across the remaining grades.

This study also addressed areas of balance of representation (BOR) and range of knowledge (ROK). BOR refers to the degree to which the score points on the assessment follow the patterns of emphasis intended in the blueprint, and ROK examines the extent to which the breadth of knowledge required to correctly answer assessment items corresponds to the breadth of knowledge defined in the academic content standards. Results for BOR were strong for all except two grades; in Spanish language arts, BOR is strong in grades 3, 4, 5, 7 and 11 but weak for grades 6 and 7. Findings from mathematics indicate that BOR is strong across all grades. However, there are signs of weaknesses in ROK which are most likely due to the use of expectation-level ratings for the ROK analyses given the relatively large number of expectations for some standards. For example, for Spanish language arts and mathematics, ROK outcomes are weak to moderate across grade levels, meaning that at least 50% of the expectations within each standard were not addressed or the items did not represent the entire range or number of expectations included in the broad concepts listed.

Accommodations for Students with Disabilities and Limited Spanish Proficiency Students

Puerto Rico has a set policy on accommodations to support the annual state assessment for students with disabilities (SWDs) and LSP students which are described in PRDE's Accommodations Manual (2004). PRDE have enhanced PRDE's efforts to review and monitor the implementation of our accommodations policy to ensure that all students who take the PPAA have the best opportunity to demonstrate what they know and can do. Accommodations for the PPAA are selected based on accommodations that the student regularly uses during instruction and that are written in the student's IEP by the *Comité de Programación y Ubicación* (COMPU) team responsible for making the accommodation decisions. Accommodations for LSP students are written into a student's Language Development Plan (LDP) by the *Comité de Revisión de Lenguaje* (CoREL), a team responsible for outlining the plan and monitoring its progress. Currently, about 80% of students with disabilities and 40% of LSP students receive accommodations during the PPAA. The most commonly used accommodations for SWDs are extended time, read aloud, change in setting, and frequent pauses. For LSP students, the

most common accommodations are extended time, reader for test directions, and use of bilingual dictionary.

During the 2011-2012 school year we commissioned several studies including a study to evaluate the degree to which accommodations selected for individual students, as indicated in their IEPs, were implemented at the time of testing. PRDE also commissioned a comprehensive literature review to examine the degree to which the accommodations frequently used on the PPAA are effective at addressing obstacles that may interfere with a student's ability to demonstrate their knowledge and skills during the assessment. Findings from the studies suggest that there is a strong alignment between the standard accommodations (i.e., extended time, read aloud, Braille, frequent breaks) listed in students' IEPs and those being implemented during the PPAA administration. Also, accommodations usage in Puerto Rico is consistent with available research and is aligned to that of other SEAs. The most frequently used accommodations for both SWDs and LSP students in Puerto Rico are allowed and supported by the majority of policies and guidelines of other SEAs.

The PRDE will remain committed to ensuring the proper implementation of our accommodations policy. As such, PRDE's intention is to provide feedback to teachers and IEP teams so they can make immediate corrections, and inform any decisions about training and support for improving the selection and implementation of accommodations for SWDs and LSP students.

Alternate Assessment

PRDE believe that all students deserve the opportunity to show what they know and can do regardless of the severity of their disabilities. With that in mind, the PRDE's assessment system includes an alternate assessment based on alternate achievement standards for students with significant disabilities who cannot participate in the general assessment: the *Prueba Puertorriqueña de Evaluación Alternativa* (PPEA). PRDE have developed specific guidelines for PRDE's IEP teams to review and apply when determining students' participation in the alternate assessment including students' needs for explicit instruction, extensive supports, and substantial modification of the curriculum. Participants in the PPEA comprise approximately 1% of the total tested student population.

The PPEA's purpose is to assess students in grades 3-8 and 11 on specific content standards. When developing the PPEA, we ensured a process to create entry targets that are academic and grade-referenced. The content standards and required grade-level expectations were selected by a committee of general and special educators in January 2008 through a content mapping session. PRDE's content specialist reviewed the selected grade-level expectations from content mapping and matched the strands to those strands instructed and assessed through the PPAA. This has resulted in a system that is organized by grade level and content strands that are consistent with those of the PPAA (general assessment).

The content of the PPEA is organized by entry targets with multiple subparts for data collection. This allows for breaking down larger grade-level expectations into smaller, measurable objectives which teachers "bundle" for meaningful instruction and in an attempt to avoid instruction that is disjointed or too limited in scope.

PPEA Alignment with PRDE's Content Standards and Grade-Level Expectations

Puerto Rico was one of five entities that collaborated with the University of Kentucky in a four-year validity evaluation project funded by a 2007 General Supervision Enhancement Grant from the Office of Special Education Programs at the U.S. Department of Education. Each of the participating entities

conducted a series of studies to address key elements in the interpretive argument for its alternate assessment based on alternate academic achievement standards. One of the studies addressed the extent to which the PPEA is aligned to the Puerto Rico academic content standards and grade-level expectations.

Karin Hess of the National Center for the Improvement of Educational Assessment (NCIEA) used the Links to Academic Learning (LAL) alignment method for this study, which addresses alignment between academic content standards and assessments as well as alignment between academic achievement expectations and tests. Results from this alignment study provide extensive evidence that the PPEA is aligned to Puerto Rico's academic content standards and grade-level expectations. The overall results revealed a very high degree (75%-100%) of emphasis on assessing academic content with the PPEA entry targets in all content areas at all grade levels. Also, the PPEA entry targets were found to be primarily academic and grade-referenced consistent with general education PPAA content and content strands. Generally, the content centrality and performance centrality of PPEA entry targets is high for all content areas and strong at most grade levels.

Alignment between Puerto Rico's Assessment System and Common Core State Standards

In 2011, PRDE commissioned the development of a Spanish-language version of the CCSS and an alignment study to compare those standards to PRDE's Spanish language arts and mathematics standards that were adopted in 2007. In October 2012, USDE officially certified PRDE standards and assessment system as being in compliance with ESEA standards and assessment requirements. Specifically, USDE certified that "Puerto Rico's system includes academic content and student academic achievement standards in reading/language arts, mathematics and science; alternate academic achievement standards for students with the most significant cognitive disabilities in those subjects; assessments in each grade level for grades 3 through 8 and grade 10 in reading/language arts and mathematics; assessments in science in each of the three required grade spans; and alternate assessments for each subject" (see letter attached). Thus, currently Puerto Rico complies with all statutory and regulatory requirements.

PRDE is now preparing to increase the rigor of its current standards and assessments to prepare students and teachers for a new generation of assessments. In addition, PRDE's Standards and Assessment Unit is developing a plan for attending the non-tested subjects and grades. Finally, in order to reach advanced proficiency levels, Puerto Rico has adopted a growth model that will provide data on students' longitudinal academic achievement. The model will be used to identify the academic priorities for each student and provide rigorous and effective academic interventions.

2013-14 School Year

As PRDE's current assessments are aligned with our standards and with the curriculum associated with those standards, we intend to retain our current assessments in the 2013-14 school year while we move into an intense period of standards revision, curriculum implementation, and professional development.

In 2013, we will begin a process of revising PRDE's standards and assessments. In 2011, PRDE commissioned the development of a Spanish-language version of the CCSS and an alignment study to compare those standards to PRDE's Spanish language arts and mathematics standards that were adopted in 2007. Although that alignment study suggested that PRDE's standards were adequate, it is time, after six years, to revisit our standards. Therefore, in school year 2013-2014 we will engage in a

process of standards review and revision for Spanish, mathematics, and science with the assistance of PRDE's technical assistance providers and PRDE's Technical Advisory Committee (TAC; Dr. Stephen Sireci – Chair; Dr. Rachel Quenemoen; Dr. Ric Luecht; and Dr. Jacqueline Leighton) (the release of the CCSS for science is anticipated for April 9, 2013; PRDE will commission the development of a Spanish language version of these standards to allow their consideration in our revision process).

Note: PRDE will be revising its standards and the new standards will replace the standards adopted in 2007. As has been detailed in other sections of this plan, PRDE will revise its academic standards during the 2013-2014 school year. The Mathematics and Spanish academic program directors have begun to constitute their respective working groups for the standards revision. The academic standards for all subject matters will undergo revision. Teacher training on the revised academic standards will take place before the end of the 2013-2014 school year. The revised standards will be implemented during the 2014-2015 school year. The 2015 PPAA assessment will include field test items aligned to the revised standards.

This review process will consider both PRDE's current standards and the Spanish version of the CCSS. With the input of PRDE's IHE, business community, and K-12 educator stakeholders, PRDE will develop a set of Spanish language arts and mathematics standards that best align to the concepts of college and career readiness for students in Puerto Rico. That may mean that we adopt the Spanish versions of the CCSS or some modification of those standards; in any case, we are committed to adopting new standards that address the CCSS principles of college and career readiness. PRDE will work with a company with deep expertise in standards development in the CCSS context to facilitate this process.

Knowing that PRDE's standards will be shifting toward a CCSS focus, we have determined that one change is necessary to the general assessments we administer operationally in the spring of 2015. This change addresses the primary gap between PRDE's current standards and the CCSS: the assessment of students' skills in reading texts and using information from those texts to respond in writing to a prompt. Our main challenge thus far has been having students answer extended response questions with the required level of depth. PRDE has been able to build students' capacities for this task with the collaboration of teachers and school district academic facilitators. PRDE understands that we are now ready to introduce assessment items similar to those for English CCSS. PRDE will prepare students for this new challenge (responding to Spanish items aligned with the CCSS) with the collaboration of teachers and school district academic facilitators. Therefore, we will add at each tested grade level one item to the Spanish language arts PPAA that requires students to read two short texts and respond in writing to a prompt related to those texts. This item will be included as a pilot test item in the spring of 2014 and will, therefore, not contribute to students' scores that year. PRDE will release school-level results on these items after the administration. Thus, this item will serve two other important purposes. First, it will allow PRDE to gather information on students' skills related to a key CCSS concept. Second, it will alert students and teachers to the transitions in expectations that will occur as PRDE revises its standards and, subsequently, our assessments. PRDE will continue efforts such as field testing items, which begins in 2013-2014, and teaching students how to respond to new types of prompts and assessment items in 2014-2015 and beyond. The finalized items will be included in the 2014-2015 operational test administration; PRDE recognizes that this may require stand-alone field testing in the fall of 2014 and perhaps also in subsequent years. PRDE will work with the vendor to safeguard against risks of poor assessment quality and ensure that new items are pilot tested and technical issues related to poor item performance are addressed. Please see previous section for details regarding how PRDE will ensure this. Additional and related information that indicates that PRDE will engage in a continuous improvement process which will involve ongoing field testing is also presented Page 37 of this request.

2014-15 School Year and Beyond

PRDE's current assessment contract will be extended to allow for uninterrupted administration and scoring through the 2013-14 school year. As noted above, the one key change to the 2014 assessments will be the addition of a pilot item to the Spanish language arts assessment in every grade that reflects a key CCSS concept.

In June 2013, we meet with our TAC to begin outlining the key features of our next generation assessment. PRDE met with its TAC in June 2013. The meeting focused on receiving their input on PRDE's ESEA Flexibility application. Each TAC member received a copy of PRDE's ESEA Flexibility plan before the meeting. All the proposed academic standards revision processes were discussed including the high quality plans establishing the timeline for accomplishing each required task. Participants at the meeting included key Central PRDE staff: the Auxiliary Secretary of Academic Services, the academic program directors, the Associate Secretary of Special Education, Planning and Education Development staff, the Standards and Assessment Unit, and Office of Federal Affairs staff among others. The TAC approved and supported PRDE's work plan and expressed confidence, based on experience with other States, that PRDE could accomplish its goals successfully. The TAC also congratulated PRDE for the commitment shown towards improving academic achievement in the island. The next TAC meeting is scheduled for November 2013.

Unlike other States, PRDE's language of instruction is Spanish so we cannot simply join one of the major consortia; although they may be including some Spanish language versions of tests, these are (a) designed as accommodations rather than core tests and (b) unlikely to reflect the linguistic and cultural considerations that are key to valid assessment of content knowledge in Puerto Rico. Thus, we must continue to develop PRDE's own assessments that maintain a link with common notions of college and career readiness yet also allow PRDE's students to demonstrate what they know and can do. At the June TAC meeting we will discuss: PRDE's next generation of assessments, changes to current assessments to increase rigor and prepare students and teachers for the next generation of assessments, best assessment alternatives to measure learning gains for students with significant cognitive impairments, the evaluation of non-tested grades, and the development and implementation of formative evaluation for non-tested subjects among other issues. The expected outcome of the meeting is to establish a work agenda to develop the next generation of assessments and alternative assessments in line with ESEA Flexibility guidelines.

Through consultation with PRDE's TAC members, we will develop an RFP that defines our requirements for PRDE's next assessment system. PRDE will release this RFP in the fall of 2013 and require the successful vendor to engage with our current vendor over a three-month period (April through June, 2014) to allow for a smoother transfer of operational responsibilities and PRDE's item bank. During this period, we will require PRDE's new vendor to conduct an alignment study of all items in our bank to our new standards. All unaligned items will be discarded and we will create an item development plan to address the gaps in a manner that allows for the development of multiple assessment forms beginning in the 2014-15 school year. PRDE anticipate that this will require stand-alone pilot tests in the fall of 2014 and will incentivize schools to participate in this process by encouraging them to be among the first to see PRDE's new items.

With regard to the participation of all students, we have already established a firm track record of high

participation level. In terms of establishing a body of evidence of assessment quality and rigor, we plan to engage the services of existing vendors to develop and carry out a plan for validity evaluation that matches the professional standards for assessment as well as the Department’s stated criteria for high quality, rigorous assessments.

Development of a Growth Model

Puerto Rico has developed a Transition Matrix model to evaluate growth in Spanish language arts and mathematics in grades 4 through 8 using scores from the current PPAA and PPEA assessment systems. High schools students are tested in grade 11, for which the Transition Matrix model will not apply since these students do not have scores from the previous year. PRDE will develop a growth model that is consistent with specific content expectations for use at the high school level and in non-tested grades and content areas.

In selecting the Transition Matrix model, PRDE commissioned a nationally recognized vendor with significant experience and recognized expertise to gather and synthesize information about growth models used in other states. Options that might be appropriate for Puerto Rico were discussed with the Technical Advisory Committee during the September 2012 meeting. After considering the options and the nature of the Puerto Rico PPAA and PPEA assessments, the Technical Advisory Committee recommended a Transition Matrix model of growth. Data from the 2011-2012 and 2012-2013 administrations of the Puerto Rico assessments were then used to construct and analyze the characteristics of the Transition Matrix model. The Transition Matrix approach to calculating growth scores is based on student level scores from the PPAA and PPEA assessments. The proficiency levels for each assessment are divided into sub-proficiency levels. Individual student growth scores are calculated from the number of sub-proficiency levels a student moves from one year to the next. These student level growth scores can then be aggregated to the teacher or school level. A major advantage of the Transition Matrix approach is that it can be applied with the PPEA as well as the PPAA assessments. It is anticipated that student growth information for Spanish language arts and mathematics in grades 4 through 8 will be available for the 2013-2014 reporting period. A general timeline for the development and implementation of the growth model is shown below.

Key milestones or Activities	Detailed Timeline	Party or Parties Responsible
Information about growth models gathered	August 2012	Standards & Assessment Unit; external vendor
Growth model options discussed with the Technical Advisory Committee; selection of Transition Matrix	September 2012	Standards & Assessment Unit; external vendor
Data from the 2011-2012 and 2012-2013 school-years used to develop the Transition Matrix	October-June 2013	Standards & Assessment Unit; external vendor
Growth scores incorporated into the scoring and reporting systems	January-June 2013	Standards & Assessment Unit; Statistics Division
Growth results for Spanish and Mathematics reported	Beginning on 2013-2014	Statistics Division

The alternative assessment, PPEA, does not use a total raw or scale score, but rather reports student results as a pattern of ratings across the dimensions of progress, performance, and complexity. The possible score patterns were classified into performance levels during the 2009 standards setting meeting. The Transition Matrix approach is applied to the PPEA by further assigning the score patterns to sub-proficiency levels.

The approval of PRDE's high quality assessment systems and the integration of a growth model attests to the fact that Puerto Rico is moving forward to annually administer a statewide aligned, high-quality assessment that measures student growth in reading/language arts and mathematics in grades 3-8 and in high school with academic achievement standards for those assessments.

In addition to developing and implementing a growth model that encompasses PRDE's state testing program, the PRDE also plans to develop assessments for the non-tested grades and subjects (with the assistance of a national recognized vendor where necessary). In all content areas where it is feasible, standardized assessments will be developed that can be used as a basis for student growth measures. When standardized assessments are not appropriate or feasible other options that will be implemented include formative assessments and student learning objectives (SLOs). PRDE will engage in a rigorous process like the one used to select the Transition Matrix model for selecting measures and models to evaluate growth at the high school level and in other non-tested grades and content areas.

PRDE's growth model will provide disaggregated student data to schools for instructional planning addressing the needs of all students. Once PRDE's assessment systems cover the non-tested areas and subjects, our growth model will also be used in the evaluation of teacher and school director effectiveness under a differentiated accountability system.

PRINCIPLE 2: STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A DEVELOP AND IMPLEMENT A STATE-BASED SYSTEM OF DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

- 2.A.i Provide a description of the SEA's differentiated recognition, accountability, and support system that includes all the components listed in Principle 2, the SEA's plan for implementation of the differentiated recognition, accountability, and support system no later than the 2013–2014 school year, and an explanation of how the SEA's differentiated recognition, accountability, and support system is designed to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

Overview of Accountability System

Puerto Rico proposes a differentiated accountability model based on the tenets of ESEA that meets the U.S. Department of Education's guidelines for flexibility as addressed in the documents entitled *ESEA Flexibility* and *ESEA Flexibility Frequently Asked Questions*. This new accountability system, presented here in Principle 2, allows for increased transparency. By setting new ambitious AMOs, identifying priority, focus, and reward schools, and supporting and encouraging the remaining non-categorized Title I schools it is our hope that parents, teachers, school directors, and members of the community will become more engaged in the process of transforming low performing schools and make meaningful contributions that result in a public school system that meets to the needs of all students. PRDE recognizes that students that do not participate in the summative assessment will be counted as non-proficient students.

PRDE's proposed system of differentiated accountability will mark a significant departure from an accountability structure that has proven to be largely punitive and ineffective in allowing PRDE to meet the specific needs of our schools and the unique needs of our students. As with most States, the number of schools in Puerto Rico identified for improvement has grown each year. As a result, PRDE has spread its funds across a large number of schools to implement school improvement interventions as required by the Elementary and Secondary Education Act. Even though progress is being made in the schools, the current accountability structure and system of interventions does not improve schools fast enough to enable schools to exit improvement status.

The initiative to serve the lowest achieving 5% of all schools as priority schools, and schools with low graduation rates or large achievement gaps as focus schools, will enable PRDE to target schools' specific needs with comprehensive and research-based interventions. In addition, this approach will enable PRDE to spend the necessary level of funds to provide services in schools and to students and ensure these funds are directed toward efforts to meet the most pressing teaching and learning needs. This flexibility will enable PRDE to implement an accountability system that will be more effective in creating systemic change in our lowest performing schools. After 10 years of ineffective efforts under the existing NCLB accountability model, adopting a new accountability system will enhance the potential impact of PRDE's school improvement efforts and make it possible to truly transform our lowest performing schools.

In rewarding the highest performing and highest progress schools, PRDE will be providing support and encouragement so that these schools continue making progress in addressing the needs of all students.

The approach of rewarding the highest performing and progressing schools will also strengthen PRDE's capacity to create and disseminate a model for cultural change across schools island-wide. All schools within the PRDE system will benefit from this new focus on practices that have resulted in improvements in teaching and learning in the highest performing schools. PRDE seeks to create an incentive system that will help schools focus on tangible goals that they can work to achieve. This incentive system will enable schools to devote valuable resources – personnel, supports, time, and money – to closing achievement gaps and improving student performance in ways that are consistent with the unique needs of their students. The incentive system will also make it easier for teachers and school directors to use available resources in ways that accommodate the unique learning needs of all students, especially Students with Disabilities (SWD) and Limited Spanish Proficient (LSP) students across grades and subjects areas.

PRDE has initiated the process of identifying schools in need of turnaround as part of our plan to use existing SIG funds to support implementation of SIG models in priority schools. Any newly identified priority schools will be awarded SIG funds to support implementation of SIG models in these schools. This means that PRDE will use SIG funds in currently identified SIG schools that are also identified as priority schools. In other words, the definition of Priority Schools include SIG Schools. By implementing a new accountability system, PRDE will be able to expand its turnaround efforts by identifying priority, focus, and reward schools. These efforts represent a significant change to the culture of education in Puerto Rico. These school categories will help PRDE cast a magnifying glass on the most problematic areas of Puerto Rico's educational system and shine a light on the most successful. Through this process of identifying weaknesses and successes, we can focus renewed energy and resources on the areas that need them the most.

As is discussed in greater detail in other sections of PRDE's Flexibility proposal, implementing a new differentiated accountability model will result in additional improvements to PRDE's existing USDE approved assessment system. These improvements will include developing additional assessments in the non-tested grades and subjects, implementing a growth model, providing student growth data to every teacher to inform instructional practices and teacher and school director evaluations, and continued improvement of our curriculum and standards (details regarding the determination that PRDE's standards have been accepted by the University of Puerto Rico system as being of high quality and rigorous to ensure that students who meet these standards are college and career ready when they graduate from high school are provided under PRDE's response to Principle 1). As evidenced in a letter from the president of the University of Puerto Rico (see attachment 5), high school students who master our rigorous standards will not require remedial coursework once in college.

PRDE's implementation of a differentiated accountability model will be consistent with federal guidelines and Puerto Rico will have rigorous AMOs based on 2011-2012 island-wide performance. PRDE expects that the use of these AMOs will lead to a 50% decrease in the percentage of non-proficient students in each subgroup within 6 years. PRDE believes the expected improvement will provide encouragement to all island schools to continue to progress and as PRDE's overall system demonstrates improvements in how it educates all children, including students with disabilities (SWDs) and limited Spanish proficient (LSP) students. PRDE believes this model will also encourage schools to close achievement gaps by focusing attention, providing relevant rewards and recognition, creating clearer expectations about the need for more improvement in the performance of the lowest-achieving groups of students and learning from those practices that prove to be effective with higher-achieving groups of students. PRDE believes these systematic improvements in how PRDE's accountability system defines and reports student performance will result in more students mastering the curriculum to become

college and career ready.

Differentiated School Supports

PRDE will identify reward, priority, and focus schools using a combination of performance information including 1) achievement results from the annual Spanish language arts, mathematics, and ESL PPAA and PPEA assessments, 2) graduation rate information at the high school level, 3) a progress indicator based on two years of assessment and graduation rate data, and achievement gap information between the highest (greater 75%) and lowest (less than 25%) quartiles. PRDE will count all grades 3-8 and 11 students not participating in the assessment as “non-proficient”. School profiles will be created using this information and, as detailed throughout PRDE’s response to Principle 2 in this section, PRDE’s leadership at the Central and district will develop differentiated supports that align with the teaching and learning needs evidenced in each school.

PRDE’s proposed model for differentiated accountability will identify as priority schools at least 5.2% of the total number of schools within the PRDE system. Thus, the total number of schools in this category is 76 schools. This includes 50 Tier I and II SIG schools and 26 high schools with graduation rates less than 50%. Similarly, PRDE intends to identify as focus schools at least 10% of the total number of schools within the PRDE system, including all Title I schools on the island. The proposed identification of schools applies to all schools, regardless of Title I status. Given that only 18 schools within the PRDE system are non-Title I schools, this decision will have minimal impact on the number of schools identified. The inclusion of all schools in PRDE’s proposed differentiated accountability system means that several of our schools that serve students with particular disabilities will be included in the differentiated accountability system. Some examples of such schools are the school for the deaf and the pediatric center serving students whose disabilities are so profound they might otherwise not be able to attend school. PRDE’s decision to use this approach is based on its goal to provide a democratic system where all schools, regardless of population served, are expected to follow the same path.

Priority Schools

PRDE’s defines priority schools as a) Tier I or Tier II SIG schools or b) high schools with a three year adjusted cohort graduation rate of less than 50%.

Once identified, priority schools undergo a comprehensive needs assessment. As the needs assessment is realized, priority schools will have access to an external provider. The goal of providing each priority school with an external provider is to enhance the supports available through the existing PRDE infrastructure and ensure that the level of support available to these schools is sufficient to result in fundamental changes. Providers will be assigned to priority schools based on their areas of expertise. This method for assigning providers helps ensure that priority schools receive support that directly addresses the issues causing the low proficiency rates. After conducting their needs assessment, priority schools will work with their assigned provider and academic support from the Central and district levels to revise their Comprehensive School Plan (CSP, detailed in PRDE’s response to Principle 1) and develop a customized School Improvement Plan.

Schools will remain in priority status implementing the SIG transformation model for a minimum of three years. PRDE believes that this three year span is necessary to ensure that interventions take hold and become part of the school culture. At the end of those three years, a school may exit priority status if, in the current academic year, it has met the AMOs for all subgroups in the school and has achieved

the higher of an absolute graduation rate above 60% or an improvement in the graduation that is one half of the difference between the baseline graduation rate and 100%. This approach ensures that there is improvement for a school anywhere in the distribution of graduation rates. For example, a school starting with a graduation rate of 40% would need to achieve a graduation rate of 70% or higher while a school starting with a 46% graduation rate would have to increase the graduation rate to 73%. This will enable PRDE to ensure that priority schools address achievement issues and promote graduation. This is a rigorous expectation that will demonstrate to PRDE, the school community, and the USDE that the schools exiting priority school status have made significant progress.

The Office of School Improvement provides oversight to priority schools through the monitoring of data in the SIG dashboard and by verifying that the external provider each school selects has the requisite expertise. The Office of School Improvement also provides oversight to ensure that the district level intervention plans that support priority schools are appropriately developed and aligned. The Office of Federal Affairs reviews the district level intervention plans to ensure compliance with federal requirements.

Priority schools will use the transformation model, Puerto Rico's preferred school turnaround model, as defined by USDE. PRDE currently has the necessary administrative infrastructures in place to initiate, support and monitor the implementation of the transformation model with priority schools. Further, PRDE is able implement the transformation model as part of its differentiated accountability system during the 2013-2014 school year. Evidence of the existing infrastructure includes PRDE's ongoing work with schools receiving support through PRDE's School Improvement Grant (SIG) program.

Focus Schools

Focus schools are those schools with graduation rates lower than 60% not already identified as Priority schools (schools with graduation rates between 50-59%) AND schools with the largest achievement gaps between the 25th and 75th student quartiles that are not making significant progress in closing these gaps, and not already identified as priority schools. A total of 146 schools have been identified as focus schools.

All focus schools will undergo a comprehensive needs assessment using a model that was developed by the Florida and Islands Comprehensive Center (FLICC). Focus schools will use historical information and outputs from the comprehensive needs assessment to modify their CSP. Per the discussion with USDE, the plans need to be adjusted based on the reason each school was identified as a focus school by December, 2013. As indicated above, the design and elements included within the CSP are detailed under PRDE's response to Principle 1. Revisions to focus schools' CSP include: 1) enhancing each school's action plan to reflect attention to the area for which the school was identified (graduation rate between 50-59% or within school achievement gap) for improvement, 2) the inclusion of significant interventions that modify past approaches to teaching and learning; and 3) detailing the support the school will need from PRDE's academic program directors in the Office of the Undersecretary of Academic Affairs. Taken together, these revisions provide a multi-pronged approach to addressing the factors that contributed to observed achievement gaps.

Once identified, focus schools will also stay in this category for implementing interventions aligned with the reasons for identification for a minimum of three years. PRDE believes that a period of three years is necessary to ensure that the proposed interventions can be fully implemented, assessed and, if effective, take hold and become part of the school culture. At the end of three years, a focus school

identified on the basis of graduation rate may exit focus status if: 1) it achieves the higher of an absolute graduation rate above 60% or an improvement in the graduation that is one half of the difference between baseline graduation rate and 100%. This approach ensures that there is improvement for a school anywhere in the distribution of graduation rates. For example, a school starting with a graduation rate of 59% would need to achieve a graduation rate of at 79.5% at the end of the three year period to exit focus status AND 2) meets its proficiency AMOs (including participation rates) All other focus schools, to exit focus schools status, must close achievement gaps to the extent that it no longer resides in the bottom 10% of schools based on gap scores and close gaps by at least 50% from their former levels.

Consistent with the approach used with priority schools, PRDE is setting rigorous expectations for focus schools so that PRDE, the school community, and the USDE can see evidence that the schools exiting focus school status have had a phenomenal change in performance. PRDE believes its approach with priority and focus schools will result in all students meeting the rigorous standards and all schools addressing the needs of all students, especially traditionally low-achieving subgroups such SWDs and LSP students.

Oversight

PRDE will implement systems to monitor both priority and focus schools to ensure that these schools are receiving the support they require to meet student needs and address the root causes of their performance problems. Monitoring will take place at least three times a year and may include desktop monitoring and/or site visits. PRDE intends to implement oversight practices that facilitate the development of a culture of communication within schools, among schools, across districts and regions and throughout PRDE's system of public education.

PRDE's Central level recognizes the importance of consistent and appropriate implementation of its differentiated accountability system. In order to demonstrate appropriate implementation and follow through of the planned interventions with priority and focus schools, PRDE will engage an external evaluator. The external evaluator will be responsible for monitoring the processes associated with the planning, implementation, and results of interventions with priority and focus schools. PRDE also intends to provide a similar assurance of the fidelity of implementation for a subset of the schools with the greatest needs that are not identified as priority, focus, or reward schools.

Reward Schools

PRDE defines reward schools as either 1) high performing schools which consist of the 5% of schools that have the highest proficiency rates for the 2010-2011 and 2011-2012 school years, the highest 2011-2012 three-year adjusted cohort graduation rates, that also met AYP in 2011-2012 and did not have significant achievement gaps that are not closing between the 25th and 75th quartiles(Puerto Rico will also consider attendance rates beginning in 2015-2016); and 2) high progress schools that consist of the 5% of schools that made the most progress from 2010-2011 to 2011-2012 in increasing overall proficiency rates and if high schools, three-year adjusted cohort graduation rates from 2011-2012 to 2012-2013, and that also did not have significant achievement gaps that were not closing. Reward schools will be publicly acknowledged and will be rewarded in meaningful ways designed to highlight the best practices of these schools and incentivize quality teaching and leadership in other schools throughout the island. Neither high- performing nor high-progress schools can meet the definition of focus or priority schools. The PRDE will offer rewards that include public notice on the PRDE website,

media attention, letters to parents honoring reward school teachers and school directors, district and/or regional events and recognition in the communities in which these schools reside. Details related to how these incentives were selected and stakeholder input into this process are detailed in PRDE's response to Principle 1. ESEA Flexibility Consultation requirements.

The definitions of school categories presented in this section for reward, focus and priority constitute approximately 25% of all schools in PRDE's system. The teaching and learning needs of the remaining non-categorized Title I schools not identified as priority, focus or reward schools will also receive support under PRDE's proposed differentiated accountability system. Each of the remaining non-categorized Title I Schools within PRDE's system will undergo a comprehensive needs-assessment. This needs assessment is similar to the needs assessment that priority and focus schools complete and was also developed by FLICC (described on pages 116-117). The needs assessment differs in that it is a self-assessment that is primarily conducted by the school improvement team within the school. PRDE will provide assistance to these schools through the academic facilitators in district offices. Once completed, this needs assessment will also be used to inform revisions of the school's CSP, including enhancing each school's action plans to reflect attention to the need to evidence continuous improvement.

PRDE has designed the self-directed needs assessments to help schools identify student and school needs and select appropriate, corresponding interventions. While the intensity of the interventions used by the remaining non-categorized PRDE schools will be different than in focus or priority schools, these interventions will address a number of issues believed to lead to performance gaps and hinder the performance of traditionally low performing groups like SWDs and LSP students. Consistent with the approaches used with priority and focus schools, PRDE will provide oversight and support for the implementation of school improvement interventions across the remaining non-categorized schools, referred to as other Title I schools. District academic facilitators will have primary responsibility for monitoring the planning and implementation of schools' interventions. District academic facilitators are responsible for ensuring that the schools are appropriately addressing these needs with interventions designed to improve the teaching and learning process for all. As indicated earlier in this section, additional assistance from an external evaluator will be used with a subset of remaining non-categorized schools to ensure fidelity of implementation.

Beginning in the 2013 school year, PRDE will ensure all school improvement interventions are aligned with the turnaround principles provided by USDE. District Academic Facilitators as well as Special Education and Limited Spanish Proficient District Academic Facilitators will have the primary responsibility of working with their assigned schools to ensure that this alignment. District level staff will be responsible for providing oversight and technical assistance to ensure all schools are satisfying the requirement to implement turnaround principles and ensure equitable access to PRDE's curriculum standards. In addition, district level staff will provide consultation on the design of instructional interventions and implementation support through various methods including providing professional development, consultation and on-site coaching.

PRDE's implementation plan provides teachers of LSP students and SWD additional technical assistance and oversight support through its LSP and Special Education Academic Facilitators. This personnel is made available to all schools and can provide on-site coaching as a form of embedded professional development. The technical assistance provided to teachers of LSP students and SWD enhances their professional capacity to differentiate instruction for LSP students and making the curriculum accessible for students with disabilities.

The methodologies that leads to school identification are listed below.

<p>Reward (High-Performing)</p>	<ol style="list-style-type: none"> 1. The proficiency for each of the most recent two years must be in the highest 5% for all schools , AND 2. The current three-year adjusted cohort graduation rate (2011-12) must be in the highest 10% of the graduation rates for all schools (only applicable to schools with graduates), AND 3. The school must have met AYP for all student groups, AND 4. The school must not have a significant achievement gap between the 25th (lowest) and 75th (highest) quartiles that is not closing. The school’s current year achievement gap must be less than the median achievement gap for all schools AND the achievement gap for the two most current years must be closing or the same as the previous year. <p>Attendance Rate (using a cut score) based on the 2014-15 data will be included in making Reward High-Performing school designations for 2015-16.</p> <p>The proficiency and gap calculations include general assessment and PPEA (alternate assessments) results for SLA, Math, and ESL in grades 3-8 and results for SLA and Math in grade 11.</p>
<p>Reward (High-Progress)</p>	<ol style="list-style-type: none"> 1. The proficiency progress (the difference between proficiency for the current year and the previous year) must be in the highest 10% of the proficiency progress for all schools , AND 2. The three-year adjusted cohort graduation rate progress (the difference between the three-year adjusted cohort graduation rate for the most current year and the previous year) must be in the highest 25% of the three-year adjusted cohort graduation rate progress for all schools (only applicable to schools with graduates), AND 3. The school must not have a significant achievement gap between the 25th and 75th quartiles that is not closing. The school’s current year achievement gap must be less than the median achievement gap for all schools AND the achievement gap for the two most current years must be closing. 4. The 25th (bottom) quartile must be improving in overall achievement for at least 10% AND the achievement for the current year 75th (top) quartile is greater than the median for the top quartile achievement for all schools in the current year. <p>Note: Graduation rate progress will be based on USDE approved three-year adjusted cohort methodology for two years; for 2013-14 the designations will be based on 2011-12 and 2012-13 graduation rates.</p>

Priority	<ol style="list-style-type: none"> 1. Tier I and Tier IISIG Schools, OR 2. High schools with three-year adjusted cohort graduation rates less than 50%.
Focus	<ol style="list-style-type: none"> 1. High schools with three-year adjusted cohort graduation rates equal to or greater than 50% and less than 60% (i.e., schools with graduation rates between 50-59%), OR 2. The 10% of schools with the largest overall achievement gap between the 25th and 75th quartiles and lacking progress in proficiency for the 25th quartile group when comparing previous year to the current year.

Assessing and Supporting School Needs

As described under PRDE’s response to Principle 1, every school in Puerto Rico is required to develop a Comprehensive School Plan (CSP). The CSP is modified annually and updated to produce an action plan for continuous improvement (focus schools and other schools) or a school improvement plan (exiting SIG schools and priority schools). It should be noted that PRDE has developed integrated technology tools that guide the development of each of these plans (CSP, school improvement plans and action plans). The use of integrated technology tools make it possible for PRDE to standardized the needs analysis and intervention planning processes, collect data for all schools, disseminate data to schools and use the data for administrative decision making at the Central and district levels. Examples of Central and district level decision making include decisions related to allocation of staff time, monitoring, and assessing schools’ implementation progress. It should be noted that the Auxiliary Planning Secretary’s office plays a central role in providing the data used for monitoring and disseminated across PRDE’s schools

The integrated technology tools used to create school level plans also make it possible for PRDE to present performance and improvement planning data and information in two data systems:

- School Improvement Grant dashboard: priority schools, including existing SIG schools, use this dashboard to track progress on 13 indicators. This dashboard enables the Office of School Improvement to oversee the interventions being implemented in these schools. It also helps priority schools develop a culture of data utilization for continuous improvement. This dashboard was designed specifically to address the needs of SIG schools and is, therefore, well suited for use by the priority schools. Some of the indicators included in the SIG dashboard may not be appropriate for schools with less need for support.
- PRDE Dashboard: non-priority schools (i.e., focus schools, reward schools, and the non-categories schools) use the PRDE dashboard to access graphic summaries of key data related to schools, students, and personnel. The data included in these dashboards is described in the needs assessments for these schools on pages 30, 31, 102, 127 and 137). The PRDE dashboard is currently in the validation phase. The planned implementation of the operational PRDE dashboard will begin with leadership within PRDE’s Central level with a primary focus on staff from the Office of the Undersecretary of Academic Affairs. In the next phase of implementation, the Office of the Auxiliary

Secretary for Planning and Educational Development will provide access to the district level support staff that are working with focus, reward and other schools. Schools will receive training related to how to use the data from the dashboard to engage in data-driven decision making related to improving teaching and learning developing and modifying action plans.

Puerto Rico's Student Subgroups

PRDE's differentiated accountability model continues to measure student achievement in the subjects and grade levels approved for use by USDE; Spanish language arts and mathematics. PRDE will calculate AMOs for grades 3 through 8, separate from grade 11, with a minimum n size of 30, which we will continue to use under ESEA flexibility. The following seven subgroups identified in the Puerto Rico Accountability Workbook, approved by the USDE in 2009, will continued to be used:

1. Economically disadvantaged students (based on family income)
2. Students with disabilities
3. Students with limited Spanish proficiency (LSP)

The Accountability Workbook (2009) also notes that "racial and ethnic minority groups in Puerto Rico do not configure in the same manner as in the mainland United States" (p. 30). Accordingly, PRDE identifies the following subgroups:

4. Puerto Rican students
5. Hispanic students (other than Puerto Rican)
6. White non-Hispanic students
7. Other origin

Recent Initiatives as Stepping Stones

Staff at the Central, regional, district and school levels throughout PRDE's system work each day to provide high quality, aligned instruction to the children of Puerto Rico. Our commitment has led PRDE to improve our standards, improve the quality of our assessments, and implement all applicable regulations. However, these activities alone are not enough to improve instruction at the classroom level.

Over the course of the last few years, the PRDE has initiated a number of projects that will help PRDE meet our AMO goals. Much of this foundational work has already begun in our SIG school. In addition, there are a number of other schools within the PRDE system that are piloting innovative strategies and practices. These projects lay initial groundwork for creating sustainable improvements in the teaching and learning that takes place in PRDE's schools. These projects will help empower the regions and school districts to drive the changes that will result in improved student outcomes.

Examples of PRDE's commitment to the island-wide improvement of our schools is also evidenced by our curriculum development work, teacher professional development trainings, instructional coaching, and school culture work, which are described below

Professional Development Should Focus on Critical Needs Areas: Mathematics

Based on results from recent academic assessments that show a lower performance in mathematics, particularly for middle and high school students, educators across PRDE are placing increased emphasis on improving teaching and learning in these areas. To this end, PRDE is developing a variety of professional development initiatives and other pilot projects to demonstrate, and ultimately strengthen, our instructional practices to better assist every student in becoming college and career ready.

In addition to the development of a comprehensive system of professional development, the Mathematics Program, under the Office of the Undersecretary of Academic Affairs, will be providing additional support for teachers through its Mathematics for the 21st Century workshop series, the EduMath for the 21st Century Centers for middle and high school math teachers, and MathCloud. EduMath Centers will:

- Disseminate new scientific contributions for the teaching of mathematics.
- Promote a research and exchange community for a diversity of teachers and scholars.
- Promote the use of blogs, social pages and webpages to support mathematics instruction.
- Develop and exchange activities and materials to improve instruction and collaborate in teacher training.

Professional Development Should Focus on Standards and Align with Classroom Practice

PRDE believes that improved teacher training based on PRDE's standards-based curriculum is a fundamental element in improving student performance in math. Currently, schools' improvement plans and action plans must include focused strategies customized to respond to evidenced needs in each academic subject area. These strategies specifically address Spanish, English, Math and Science and provide for increased opportunities for PRDE leadership at the Central and district levels encourages schools to employ job-embedded professional development that is closely connected to what teachers are required to teach. PRDE believes this will increase the likelihood that the skills and knowledge gained from such learning is immediately transferred to the classroom. For priority schools, external providers are assisting teachers by providing classroom coaching, structured common planning time, mentoring and observation of classroom practices.

Increase Learning Time

PRDE believes that increased learning time is beneficial to teaching and learning. As such, each SIG school has also extended its learning time in the priority areas it has identified. This has resulted in a longer instructional day and school year and increased the opportunities for teaching and learning in core academic subjects. This additional time makes it possible for teachers to implement strategies such as leveled tutoring based on each student's needs, curriculum integration to encourage students to make meaningful and relevant connections between the different disciplines, and learning by doing. PRDE is engaging in oversight and evaluation of the use of these educational interventions and strategies to better understand what works and what needs to be modified.

Summary

PRDE's implementation of a differentiated accountability system will allow PRDE to focus our resources

on the lowest performing schools and those with the largest achievement and growth gaps and continue to develop and extend the customized interventions discussed above. Over time, through the use of these types of targeted interventions and continued focus on ambitious but achievable academic targets, PRDE believes that priority and focus schools will improve to the point at which they can exit priority or focus school status. PRDE recognizes that, despite improvements in some of the most needy schools, there may continue to be schools in each of these categories. PRDE believes that our continued effort to develop interventions in these areas will reduce the degree of need among all schools and promote overall achievement and growth. PRDE understands that achieving this goal will take great commitment and determination, and has organized its internal operations and human capital in a way that will allow it to succeed at making this goal a reality. PRDE's recent initiatives demonstrate focused attention on the island's lowest-achieving schools and student subgroups, the implementation of the transformation model including extended learning time, and the flexibility to use a portion of federal funds differently. PRDE believes that, if granted the flexibility to continue this work, our schools will be able to meet AMO targets and decrease the percent of non-proficient students by fifty percent in six years.

Curriculum Documents and Professional Development Boot Camps

This section describes previous efforts that are expected to continue in the upcoming and future academic years.

As described in Principle 1 (page 39), during the 2010-2011 and 2011-2012 school years, we developed curriculum documents, aligned to the standards, in grades K-12 for Spanish language arts, mathematics, science, English as a second language (ESL), and core content courses at the high school level. Through this process, we established a stakeholder group of teachers and administrators to engage in the development, review, and approval of the curriculum and professional development activities, and to ensure that these materials were aligned with the 2007 content standards and grade-level expectations. Curriculum materials for grades 4-8 were piloted in six public schools during the 2011-2012 school year.

In 2011 and 2012, we held professional development "boot camps" to provide support and training on curriculum materials (scope and sequence documents, curriculum maps, and teaching strategies in ESL, SLA, mathematics, and science for grades K through 12), aligned to the standards, to teachers, academic facilitators, and academic auxiliary superintendents throughout all seven regions. In July 2012, all 28 school districts provided the Office of the Undersecretary of Academic Affairs with a work plan on the island-wide implementation of the curriculum materials for all teachers in the four content areas and school directors. In August 2012, all school districts provided training on the curriculum materials to all four content areas teachers island-wide. These materials have been distributed to each school and will be available on the PRDE website in the near future. In addition, the Office of the Undersecretary of Academic Affairs provided an internal workshop to all program directors whose subject areas are not tested by the state's assessment and they were encouraged to develop curriculum maps, scope and sequence documents, and pacing guides for their programs. These directors were also encouraged to integrate and align their programs with ESL, SLA, mathematics, and science.

Through the professional development activities described we learned that the materials and training we currently have needs to be better aligned with teachers' experience and needs. For instance, teachers found it difficult to integrate the materials into their everyday practice due to difficulties understanding the language used to describe expectations for the standards. During the 2012-2013 school year, the Standards and Assessment Unit began a team effort to improve teacher training and

related resources with an eye for promoting teachers' understanding of the curricular materials and their use in the classroom.

In addition, PRDE is working with its external providers to develop a comprehensive system of professional development that targets implementation of the curricula island-wide. The key components of this plan are:

- Island-wide implementation of professional development supports beginning in August 2013;
- Tiered implementation to target the priority (including SIG) and focus schools in a more intense manner:
 - Priority schools (including SIG schools) will have on-site content-specific coaches that are assigned to no more than two schools each and establish Communities of Practice to support schoolwide changes;
 - Focus schools will have on-site content-specific coaches that are assigned to no more than three schools each and establish Communities of Practice to support schoolwide changes;
 - All district academic coordinators (District Academic Facilitators, District and Municipal Special Education Academic Facilitators, LSP Academic Facilitators, Academic Auxiliary Superintendents) will be trained to provide supports at the school- and teacher-level in support of the coaches and to schools other than the SIG, priority, and focus schools;
 - All educators will have on-demand access to a series of on-line professional development modules that target key instructional aspects of the curricula.

For the priority (including SIG), and focus schools, professional development will be tailored to meet the specific needs of the school and the individual teachers within the school. It should be noted that PRDE is not relying on a workshop model as we have found this to be ineffective in changing classroom practices. While some professional development will include school-level workshops, coaches will work on an on-going basis to support continuous implementation through regular instructional practice and related classroom activities.

From the summer of 2013 throughout the 2013-14 school year, PRDE will engage existing providers to leverage the services they have provided/are providing and design and implement a professional development system. PRDE's goal with this work is to create an appropriate tool for gathering and disseminating best practices related to content, methodology and access. The goal of this professional development system is to ensure that PRDE leadership and other Puerto Rico stakeholders and groups (teacher and directors associations, unions, IHE teacher preparation programs) are engaged in the development of and have access to the methods PRDE is using to support teachers in shifting their practice.

Instructional Coaching and Communities of Practice

As evidenced by professional development supports discussed in the previous section, PRDE is committed to providing direct support to teachers while implementing standard-based instruction.

PRDE want to provide our teachers with opportunities to improve their practice so that students then have increased opportunities for greater exposure to high quality academic instruction.

During the 2011-2012 school year, PRDE introduced an instructional coaching model to provide teachers with sustained guidance and support in both content and pedagogy as they implement the grade level curriculum frameworks and pacing guides in grades 4-8 in SLA, ESL, mathematics, and science. Teachers from the six curriculum pilot schools received in-classroom guidance and lesson plan modeling four times during the school year. To continue that support, we also established communities of practice to help build capacity within teacher groups, academic facilitators, and school directors by providing them with forums for engaging with their content area colleagues with the purpose of discussing instructional best practices and generating solutions for instructional challenges. These initiatives will continue and implementation in the 2013-2014 school years will be aligned with the development of the comprehensive system of professional development described above.

PRDE's School Culture Project

Puerto Rico recognizes a positive school culture is linked to the improvement of academic achievement and is therefore committed to improving school culture island-wide. As such, we commissioned a school culture study in 2011-2012 to assess school culture in a sampling of island schools. The purpose of the study was to determine the degree to which the six pilot schools have developed and implemented practices related to a school culture that supports the implementation of the new standards-based curriculum. Specifically, the study addressed five critical elements impacting school culture: teaching and learning, the influence of school leadership, school community relationships, safety, and the physical environment. The sample encompassed a range of grade levels, and served both rural and urban areas. Each one of the schools in this study had been operating under improvement plans for a period of three to nine years.

In light of the findings from the school culture study, PRDE is considering several recommendations that could be implemented across schools and promote the creation of a school culture that promotes academic achievement and improved outcomes for students, teachers, and school directors. PRDE will make a subset of these recommendations, and related implementation supports, available for consideration by district staff as they work with schools to facilitate the development of school improvement plans and action plans for continuous improvement. The Office of the Undersecretary of Academic Affairs will have responsibility for reviewing and approving school culture interventions and will also be responsible for directing district and/or regional staff to monitoring implementation under PRDE's differentiated accountability system.

Bilingual Pilot School Programs

PRDE recognizes the importance of learning to communicate in multiple languages to succeed in today's global society. PRDE currently have 14 specialized bilingual schools around the island where teaching takes place both in English and Spanish. The goal is to expand the language offerings to other languages to better prepare students for the opportunities and challenges of the 21st century.

During the 2012-2013 school year, Puerto Rico tested two new initiatives to promote bilingualism in the public school system. These initiatives involved instructional practices that were beyond the core English as Second language curriculum and instruction offered in grades K-12. These initiatives sought to help students achieve acquisition of the English language and also ensure proficiency in literacy and

communication skills. Participation in these initiatives was made available to all students, including students with disabilities and limited Spanish proficiency students. Both of these initiatives, presented in greater detail below, are managed by the Office of the Undersecretary of Academic Affairs.

- Empowering Students for the 21st Century (ES21): This initiative is being implemented in 35 public schools across the island and impacts approximately 5,000 students including students with disabilities and LSP students. Twelve of these schools already participate in the full bilingual immersion model while the other 23 schools offer special bilingual programs. A total of 83 teachers from these schools are currently enrolled in a certification program in bilingual education at the University of the Sacred Heart (*Universidad del Sagrado Corazón*).
- The Bilingual Education for the 21st Century (BEC21): This initiative is being implemented in 32 schools, from kindergarten through grade 2, and impacts approximately 4,800 students and 280 teachers. Under this initiative Math and Science are offered in English. PRDE is committed to providing these schools with the supports they need to ensure successful implementation of this program. These supports include four hours of coaching (Monday through Thursday), 102 hours of professional development, innovative instructional materials, extended hours where we encourage parents' involvement, and summer camp.

At the beginning of the 2013-2014 school year, PRDE will evaluate the experience gained from these two initiatives in order to determine how to best strengthen bilingual skills and programs. This evaluation will include a review of the achievement scores from these schools and the collection of feedback from participating teachers. PRDE's Office of the Undersecretary of Academic Affairs will consider the effects and experiences of these projects and recommend/share best practices with other schools that, based on the findings of their needs assessments, could be reasonably expected to benefit from similar approaches. Successful strategies from these two pilot initiatives will be documented and shared with all schools across the PRDE system so that all schools and student groups can benefit from practices that are determined to be effective. Effective practices will also be included within the professional development system discussed above.

Throughout the 2013-2014 school year, PRDE will engage educators at the school and district levels in conversations (during regularly scheduled meetings, professional development workshops, during school site visits and monitoring visits) so that it can facilitate a process of ongoing review and evaluation of the effects of current initiatives. PRDE will use these structured dialogues to inform determinations about the varying degrees to which available programs and new initiatives can be implemented in more schools across the system. In this way, PRDE intends to spread best practices and remain aware of how much time educators are spending in implementing different programs. This level of review will help ensure that PRDE's staff at the Central and District levels are able to provide educators good guidance and ensure school level staff have sufficient time to devote to activities that support basic teaching and learning, targeted school improvement efforts and special initiatives.

2.A.ii Select the option that pertains to the SEA and provide the corresponding information, if any.

<p>Option A</p> <p><input checked="" type="checkbox"/> The SEA includes student achievement only on reading/language arts and mathematics</p>	<p>Option B</p> <p><input type="checkbox"/> If the SEA includes student achievement on assessments in addition to reading/language</p>
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<p>assessments in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools.</p>	<p>arts and mathematics in its differentiated recognition, accountability, and support system or to identify reward, priority, and focus schools, it must:</p> <ul style="list-style-type: none"> a. provide the percentage of students in the “all students” group that performed at the proficient level on the State’s most recent administration of each assessment for all grades assessed; and b. include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.
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The PRDE will only use the results of its Language Arts (Spanish Language) and mathematics tests for accountability determinations.

2.B SET AMBITIOUS BUT ACHIEVABLE ANNUAL MEASURABLE OBJECTIVES

Select the method the SEA will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics for the State and all LEAs, schools, and subgroups that provide meaningful goals and are used to guide support and improvement efforts. If the SEA sets AMOs that differ by LEA, school, or subgroup, the AMOs for LEAs, schools, or subgroups that are further behind must require greater rates of annual progress.

<p>Option A</p> <p><input checked="" type="checkbox"/> Set AMOs in annual equal increments toward a goal of reducing by half the percentage of students in the “all students” group and in each subgroup who are not proficient within six years. The SEA must use current proficiency rates based on assessments administered in the 2011–2012 school year as the starting point for setting its</p>	<p>Option B</p> <p><input type="checkbox"/> Set AMOs that increase in annual equal increments and result in 100 percent of students achieving proficiency no later than the end of the 2019–2020 school year. The SEA must use the average statewide proficiency based on assessments administered in the 2011–2012 school year as the starting point for setting its AMOs.</p>	<p>Option C</p> <p><input type="checkbox"/> Use another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups.</p> <ul style="list-style-type: none"> i. Provide the new AMOs and an explanation of the method used to set these AMOs. ii. Provide an educationally
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<p>AMOs.</p> <p>i. Provide the new AMOs and an explanation of the method used to set these AMOs.</p>	<p>i. Provide the new AMOs and an explanation of the method used to set these AMOs.</p>	<p>sound rationale for the pattern of academic progress reflected in the new AMOs in the text box below.</p> <p>iii. Provide a link to the State’s report card or attach a copy of the average statewide proficiency based on assessments administered in the 2011–2012 school year in reading/language arts and mathematics for the “all students” group and all subgroups. (Attachment 8)</p>
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Setting Annual Measurable Objectives

In keeping with option A, the new AMOs represent a step towards achieving a differentiated reduction in the percentage of students who are not proficient over six years. Each subgroup’s AMOs were set on the groups’ 2011-2012 proficiency rates with equal steps (rounded to a single decimal place) leading to a 50% reduction in the percent of non-proficient students within six years. Exhibits 10– 13 reflect the proposed AMOs for Puerto Rico. The AMOs (below) follow the same subgroup system as had been developed for AYP determinations which include the special services categories of poverty, disabilities, and Spanish language learners (as accepted by the USDE in the Accountability Workbook, 2009).

<p>Puerto Rico’s Student Subgroups</p>	<ol style="list-style-type: none"> 1. Economically disadvantaged students (based on family income) 2. Students with disabilities 3. Students with limited Spanish proficiency (LSP) 4. Puerto Rican students 5. Hispanic students (other than Puerto Rican) 6. White non-Hispanic students 7. Other origin
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Puerto Rico proposes these AMOs based on two factors, the first being the separation of AMOs for students in grades 3-8 from those for high schools since there is a clear difference in performance at the

high school level compared to the lower grades. This separation will allow for more rigorous targets for the lower grades than would have been developed had grade 11 been included. This also allows for more realistic targets for high schools. The following data tables (see Exhibit 8 and

Exhibit 9) help to illustrate the need to separate the grade spans.

Overall Student Performance on the Puerto Rico State Assessments

The following performance data was used to develop the new AMOs under this differentiated recognition, accountability, and support system.

Exhibit 8. Spanish Language Arts Proficiency

	2008-2009	2009-2010	2010-2011	2011-2012
Grade 3	47%	52%	54%	59%
Grade 4	37%	40%	44%	51%
Grade 5	39%	40%	44%	46%
Grade 6	45%	46%	48%	50%
Grade 7	35%	33%	37%	39%
Grade 8	36%	39%	45%	43%
Grade 11	35%	35%	38%	40%

Exhibit 9. Mathematics Proficiency

	2008-2009	2009-2010	2010-2011	2011-2012
Grade 3	59%	65%	66%	70%
Grade 4	41%	48%	52%	55%
Grade 5	30%	37%	40%	41%
Grade 6	5%	9%	10%	15%
Grade 7	4%	6%	7%	8%
Grade 8	3%	7%	9%	9%
Grade 11	2%	4%	8%	9%

The second factor is that these AMOs are set separately by subgroup instead of by the whole school. The proposed AMOs create a system in which schools are encouraged to differentially focus more energy on improving the performance of those students in the traditionally low achieving subgroups.

As indicated above, PRDE’s proposed AMOs are based on the 2011-2012 data for the entire island. These scores include the performance of students using either Puerto Rico’s general or alternate assessment. The participation rate on the assessment system was well over the required 95%, so these baseline results are representative of island-wide student performance by subgroup. The decision was made to use the island pass rate for the baseline as opposed to selecting proficiency for a single school (as was the mandate previously). PRDE believes this approach will better represent the performance of

students across the island and hold the lowest performing schools to a rigorous standard.

PRDE will continue to report subgroup performance against the new AMOs for all schools. Included in this reporting will be the participation rate by subgroup and the other academic indicator of either attendance or graduation rate. The thresholds for these other indicators have not been modified since the latest approval of the Accountability Workbook (2009). PRDE understands that schools must make participation rates for every subgroup.

As part of our commitment to promote college participation for all students including SWDs and LSP students, PRDE is working towards being able to annually publish both the college going and college credit accumulation rates for each identified subgroup that has at least 30 students in each high school in Puerto Rico. This reporting will become effective as the new State Longitudinal Data System comes on-line and we are able to expand its functionality to collect post-secondary data.

New AMOs for Puerto Rico’s Differentiated Accountability System

The four exhibits below outline the new AMO targets for each student subgroup, by subject and by grade level, over the next six years (see Exhibit 10, Exhibit 11,

Exhibit 12, and Exhibit 13). The new AMOs were developed using 2011-2012 data as the baseline for each subgroup. The 2017-2018 goal of a 50% reduction in the percent of non-proficient students by subgroup was set. The difference between these numbers was calculated and divided by six to determine the equal, annual increases for each subgroup to reach the 2017-2018 goal.

Exhibit 10. Spanish Language Arts AMOs by Subgroup for Grades 3-8

Grades 3-8	Spanish Language Arts						
	Student Group	Baseline 2011-12	2012-13	2013-14	2014-15	2015-16	2016-17
All	47.7	52.1	56.4	60.8	65.1	69.5	73.9
Students with Disabilities	32.8	38.4	44.0	49.6	55.2	60.8	66.4
Limited Spanish Proficiency	37.5	42.7	47.9	53.1	58.3	63.5	68.8
Economically Disadvantaged	45.1	49.7	54.3	58.8	63.4	68.0	72.6
Puerto Rican	47.7	52.1	56.4	60.8	65.1	69.5	73.9
Hispanic, non Puerto Rican	45.9	50.4	54.9	59.4	63.9	68.4	73.0
White, non-Hispanic	41.8	46.7	51.5	56.4	61.2	66.1	70.9
Other Origin	48.9	53.2	57.4	61.7	65.9	70.2	74.5

Exhibit 11. Mathematics AMOs by Subgroup for Grades 3-8

Grades 3-8	Mathematics
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Student Group	Baseline 2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18
All	32.2	37.9	43.5	49.2	54.8	60.5	66.1
Students with Disabilities	27.5	33.5	39.6	45.6	51.7	57.7	63.8
Limited Spanish Proficiency	30	35.8	41.7	47.5	53.3	59.2	65.0
Economically Disadvantaged	31.2	36.9	42.7	48.4	54.1	59.9	65.6
Puerto Rican	32.2	37.9	43.5	49.2	54.8	60.5	66.1
Hispanic, non Puerto Rican	31.3	37.0	42.8	48.5	54.2	59.9	65.7
White, non- Hispanic	27.2	33.3	39.3	45.4	51.5	57.5	63.6
Other Origin	35.6	41.0	46.3	51.7	57.1	62.4	67.8

Exhibit 12. Spanish Language AMOs by Subgroup for Grade 11

Grade 11		Spanish Language Arts					
Student Group	Baseline 2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18
All	40.5	45.5	50.4	55.4	60.3	65.3	70.3
Students with Disabilities	14.3	21.4	28.6	35.7	42.9	50.0	57.2
Limited Spanish Proficiency	19.2	25.9	32.7	39.4	46.1	52.9	59.6
Economically Disadvantaged	36.6	41.9	47.2	52.5	57.7	63.0	68.3
Puerto Rican	40.5	45.5	50.4	55.4	60.3	65.3	70.3
Hispanic, non Puerto Rican	43	47.8	52.5	57.3	62.0	66.8	71.5
White, non- Hispanic	34.6	40.1	45.5	51.0	56.4	61.9	67.3
Other Origin	34.5	40.0	45.4	50.9	56.3	61.8	67.3

Exhibit 13. Mathematics AMOs by Subgroup for Grade 11

Grade 11		Mathematics					
Student Group	Baseline 2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18

All	8.9	16.5	24.1	31.7	39.3	46.9	54.5
Students with Disabilities	3.4	11.5	19.5	27.6	35.6	43.7	51.7
Limited Spanish Proficiency	10.3	17.8	25.3	32.7	40.2	47.7	55.2
Economically Disadvantaged	7.8	15.5	23.2	30.9	38.5	46.2	53.9
Puerto Rican	8.9	16.5	24.1	31.7	39.3	46.9	54.5
Hispanic, non Puerto Rican	10	17.5	25.0	32.5	40.0	47.5	55.0
White, non-Hispanic	3.8	11.8	19.8	27.9	35.9	43.9	51.9
Other Origin	7.1	14.8	22.6	30.3	38.1	45.8	53.6

2.C REWARD SCHOOLS

2.C.i Describe the SEA’s methodology for identifying highest-performing and high-progress schools as reward schools. If the SEA’s methodology is not based on the definition of reward schools in *ESEA Flexibility* (but instead, e.g., based on school grades or ratings that take into account a number of factors), the SEA should also demonstrate that the list provided in Table 2 is consistent with the definition, per the Department’s “Demonstrating that an SEA’s Lists of Schools meet ESEA Flexibility Definitions” guidance.

Selecting Reward Schools

In keeping with the guidelines for the flexibility request as addressed in the USDE documents entitled *ESEA Flexibility* and *ESEA Flexibility Frequently Asked Questions*, Puerto Rico plans to use the following methodology for identifying highest-performing and high-progress schools as Reward schools.

High-Performing

1. The proficiency for each of the most recent two years must be in the highest 5% for all schools , **AND**
2. The current three-year adjusted cohort graduation rate (2011-12) must be in the highest 10% of the graduation rates for all schools (only applicable to schools with graduates), **AND**
3. The school must have met AYP, **AND**
4. The school must not have a significant achievement gap between the 25th and 75th quartiles that is not closing. The school’s current year achievement gap must be less than the median achievement gap for all schools **AND** the achievement gap for the two most current years must be closing or the same as the previous year.

Attendance Rate (using a cut score) based on the 2014-15 data will be included in making Reward High-Performing school designations for 2015-16.

The proficiency and gap calculations include general assessment and PPEA (alternate assessments) results for SLA, Math, and ESL in grades 3-8 and results for SLA and Math in grade 11.

High-Progress

1. The proficiency progress (the difference between proficiency for the current year and the previous year) must be in the highest 10% of the proficiency progress for all schools , **AND**
2. The three-year adjusted cohort graduation rate progress (the difference between the three-year adjusted cohort graduation rate for the most current year and the previous year) must be in the highest 25% of the three-year adjusted cohort graduation rate progress for all schools (only applicable to schools with graduates), **AND**
3. The school must not have a significant achievement gap between the 25th and 75th quartiles that is not closing. The school's current year achievement gap must be less than the median achievement gap for all schools AND the achievement gap for the two most current years must be closing or the same as the previous year AND the 25th (bottom) quartile must be improving in overall achievement AND the achievement for the current year 75th (top) quartile is greater than the median for the top quartile achievement for all schools in the current year.

Note: Graduation rate progress will be based on USDE approved three-year adjusted cohort methodology for two years; for 2013-14 the designations will be based on 2011-12 and 2012-13 graduation rates.

Priority and Focus schools may not be identified as High-Performing or High-Progress schools.

2.C.ii Provide the SEA's list of reward schools in Table 2.

Table 2 is included as Attachment 9 located on page 137.

2.C.iii Describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools.

Rewarding Highest Performing and High Progress Schools

The PRDE plans to publicly recognize reward schools with meaningful incentives for improving their effectiveness at assisting students to become college and career ready, as evidenced by student achievement status , school progress and progress in closing achievement gaps. The rewards for high-progress and high-performing schools will be the same.

To identify methods of local recognition, we solicited input from school staff and other stakeholders at our 2012 forums seeking public feedback on this flexibility request. The process for collecting feedback on this topic and the detailed responses collected from stakeholders are presented as part of PRDE's response to ESEA Flexibility Consultation requirements. Stakeholders provided valuable insight on the rewards that will be meaningful to schools and their communities. Among the rewards

that will be awarded by the Office of the Undersecretary of Academic Affairs are:

- public recognition on the PRDE website
- public recognition via press releases to media outlets island-wide
- special certificate from the Secretary of Education to each reward school
- letters to the parents of students in reward schools notifying them of the schools' exceptional teachers and school directors
- ongoing professional development
- financial rewards (if funds are available)
- allowing schools to select their paint color

PRDE will encourage regions and school districts to reward these schools in a manner that is most significant to the schools themselves (i.e., school directors and teachers), parents and students, and the community at large. Some of the rewards the public would like to see are: maintenance of existing equipment, and partnerships with businesses and community entities. In addition, stakeholders suggested that reward schools offer workshops to the community on how to support their children at home. Participants in public forums also expressed that the recognition and rewards should be significant, resulting in community engagement and participation. The Office of the Undersecretary of Academic Affairs will reach out to community leaders, including those from local foundations, businesses, universities, and other sectors of the community at-large, to encourage them to support high-achieving local schools.

As previously discussed, Puerto Rico functions as a single LEA and is organized into seven regions. Each region is divided into 28 school districts. This service model provides the advantages; of enabling PRDE to create and implement a reward structure that is consistent with the wants, needs and expectations of the local school community. Allowing local involvement in the design of rewards for schools strengthens the schools' existing relationships with the local community. Past experience indicates that PRDE schools welcome and appreciate the local recognition of their academic achievement and performance. It is our vision that this local recognition provides a more meaningful method of recognition than centrally managed methods. The school communities within PRDE have a strong link to the schools serve and are best positioned customize the recognition methods. Additionally, from a logistical point of view, it is more feasible to hold a rally for reward schools in a region than to attempt to transport teachers across the island for a single rally in the capital. Thus, the Office of the Undersecretary of Academic Affairs expects that districts and regions will continue recognizing the reward schools in their district and will be responsible for the provision of the rewards stakeholders recommended in the 2012-2013 school year and beyond. The Office of the Undersecretary of Academic Affairs will monitor district recognition plans to ensure that they are appropriate and aligned with school level achievements and community interests.

PRDE is taking action to disseminate promising practices found in reward schools. One means of island-wide communication about rewards is the SIG rewards guide which is currently under revision by the Office of School Improvement and the Undersecretary of Academic Affairs. The revised document will incorporate the recommended rewards discussed and integrate mentorship of low-performing schools by high-performing schools as an additional reward. The guide and corresponding

Circular Letter will be released in the summer of 2013.

PRDE's overall reward structure serves several purposes. First, it demonstrates the commitment of the Secretary of Education and the Governor to the success of Puerto Rico's school by acknowledging their efforts and use of effective practices. Second, it provides visibility to the island's top performing schools which enables them to serve as both models and resources for other schools. Third, these rewards honor the hard work of teachers and school directors in these schools and acknowledge the important role they play in the success of these students. After a number of years of recognizing these schools, the PRDE, the schools, and the communities across the island will have developed a mutual foundation of effective practices used in schools.

2.D PRIORITY SCHOOLS

2.D.i Describe the SEA's methodology for identifying a number of lowest-performing schools equal to at least five percent of the State's Title I schools as priority schools. If the SEA's methodology is not based on the definition of priority schools in *ESEA Flexibility* (but instead, e.g., based on school grades or ratings that take into account a number of factors), the SEA should also demonstrate that the list provided in Table 2 is consistent with the definition, per the Department's "Demonstrating that an SEA's Lists of Schools meet ESEA Flexibility Definitions" guidance.

Selecting priority schools

In keeping with the guidelines for the flexibility request as addressed in the USDE documents entitled *ESEA Flexibility* and *ESEA Flexibility Frequently Asked Questions*, Puerto Rico plans to use identify a Priority School as a school that, based on the most recent data available, has been identified as among the lowest-performing schools. The total number of Priority schools in a must be at least five percent of the Title I schools in the State. The proposed identification of schools applies to all schools, regardless of Title I status. Given that only 18 schools within the Puerto Rico system are non-Title I schools, this decision will have minimal impact on schools identified. Puerto Rico served 1,457 Title I Schools in 2010-11; thus, the number of Priority schools identified will be a minimum of 73 or 5% of the schools.

Puerto Rico defines priority schools as:

1. Tier I or Tier II SIG schools, **OR**
2. High schools with a three-year adjust cohort graduation rate of less than 50%.

A total of 76 schools have been identified as Priority schools. Of those 76 schools, currently 50 SIG schools and are 26 high schools with a three-year adjusted cohort graduation rate of less than 50%. The SIG schools include one secondary school (grades 7-12) and six high schools (grades 10-12). Their number of years of classification as a priority school will be counted beginning with each school's identification as a SIG school. PRDE's SIG schools are already in the process of implementing turnaround interventions aligned with the transformation turnaround model. The remaining priority schools have not yet begun to implement school-wide turnaround interventions aligned with the transformation model.

PRDE will manage three subsets of schools within this category. These subsets are 1) SIG schools identified for the 2011-2012, 2) SIG schools identified for the 2012-2013 and 3) the remaining non-SIG priority schools that were identified at the end of the 2012-2013 school year. PRDE recognizes that each of these three subgroups will have different implementation timelines and that all priority schools must be fully implementing by the 2014-2015 school year. Interventions for non SIG priority schools will begin in 2014-2015 with eligibility for exiting priority status at the end of 2016-2017.

To identify the remaining 26 priority schools, PRDE will select high schools with a three-year adjusted cohort graduation rate less than 50%.

Due to the exceptional level of support being provided to the priority schools, only 5% of schools will be identified at any time. Thus once the initial identification occurs, new schools cannot be placed into priority status until one or more schools exit.

Priority schools will remain in priority status for a minimum of three years. PRDE believes that this three year span is necessary to ensure that interventions take hold and become part of the school culture. At the end of those three years, a school may exit priority status if, in the current academic year, it has met the AMOs for all subgroups in the school and has achieved the higher of an absolute graduation rate above 60% or an improvement in the graduation that is one half of the difference between the starting/baseline graduation rate and 100%. This will enable PRDE to ensure that priority schools address achievement issues and promote graduation. This is a rigorous expectation that will demonstrate to PRDE, the school community, and the USDE that the schools exiting priority school status have made significant progress.

SIG Schools (Inclusion and Expansion of)

Twenty-nine cohort I tier I SIG schools began implementation of the Transformation Model during the 2011-2012 school year and are required to implement the interventions for the remaining two years. These schools, if they meet the other exit criteria defined in section 2Dv below, would be eligible for exiting priority status at the end of the 2013-2014 school year.

Twenty-four cohort II SIG schools engaged in pre-implementation activities during the 2012-2013 school year, and will begin implementation of the Transformation Model during the 2013-2014 school year. These twenty-four SIG schools are required to implement the model for three years and would be eligible to exit priority status after the 2015-2016 school year, assuming they meet all other exit criteria described in section 2Dv.

Non-SIG Schools

The 26 non-SIG priority schools have been identified based on having a three-year adjusted cohort graduation rate of less than 50% will begin to implement transformation model interventions in 2013-2014. These schools will remain in the priority category for at least three years. These schools will be eligible for exiting priority status at the end of the 2015-2016 school year.

As has been stated, there is no distinction between SIG and non-SIG priority school interventions. PRDE will be implementing SIG model interventions to all priority schools including SIG and non-SIG schools.

2.D.ii Provide the SEA’s list of priority schools in Table 2.

Table 2 is included as Attachment 9 located on page 118.

2.D.iii Describe the meaningful interventions aligned with the turnaround principles that an LEA with priority schools will implement.

Interventions for Priority Schools

Based on several factors, including Puerto Rico preference, the only two turnaround models that will be used are transformation and school closure. Of the four school turnaround models defined by the USDE, Puerto Rico’s preferred model is the transformation model. For PRDE, school closure is a possible option under certain circumstances. PRDE must consider that some students live in remote areas and may not have geographically reasonable access to another school. Recognizing that PRDE is responsible for providing access to a free public education and that students’ educational needs must be met, PRDE has determined that in those cases the transformation model is the most appropriate and culturally relevant turnaround model to be applied.

PRDE’s implementation of the transformation school turnaround is discussed in the following sections. In implementing the transformation model, Puerto Rico is implementing interventions that satisfy the turnaround principles as defined in the USDE document entitled *ESEA Flexibility*.

Outline of Process: Overview

To enable a priority school to make dramatic, systemic changes, interventions must be appropriate and schools must have sufficient time to make and sustain changes. The interventions selected must provide for realistic implementation and oversight. For this reason, the PRDE proposes the following process to develop intervention plans based on individual priority school needs. What follows is a description of district level supports that are in addition to the school-specific interventions described earlier in this principle.

Districts with a priority school will be required to prepare an intervention plan that explains how they will support each school. The intervention plan must: a) demonstrates how achievement and other performance data support the selection of interventions and align with the reporting metrics b) outlines proposed interventions, and c) details how the interventions will be implemented at the school level.

The foundation of the district-level intervention plans is data. This data comes from various sources including each school’s diagnostic assessment of needs. PRDE staff at the Central and district level understand that performance and other data should inform the intervention strategies proposed. Appropriate district level plans will be those that clearly link interventions with a school’s needs and established goals.

In order to realize significant improvements in priority schools, PRDE has decided to engage individuals and organizations that have expertise in educational improvement. These external providers will be selected from the PRDE’s list of pre-approved providers (additional information regarding PRDE’s process for engaging vendors is provided in the next paragraph). External providers will assist priority schools in the planning and implementation of the interventions that result in school transformation. The description of district level interventions will be 1) in addition to, and 2) in support of the support

services to be provided by the external providers.

To develop the list of pre-approved providers, the PRDE released a Request for Qualifications (RFQ) and conducted an orientation for potential providers. Interested providers submitted proposals to the Office of School Improvement (OSI). OSI trained both internal and external reviewers on proposal evaluation. The evaluation criteria were based on the degree to which providers could address the academic needs of all students, LSP students and students with disabilities and 2) the ideological and practical issues related to implementing a transformation model. Based on the review process, providers were selected and identified for inclusion on the PRDE list of pre-approved providers. Provider involvement and roles are described in more detail below on page 91.

Districts will submit Intervention plans that specify how they will promote continuous improvement in the priority schools in their districts. The Office of School Improvement will review and approve the specific interventions presented in the district level intervention plan. The district level intervention plan will be evaluated to determine the degree to which it enhances and extends the interventions outlined in the priority schools' improvement plans.

Identifying School Needs

Staff from the Central and district levels will help each priority school conduct a diagnostic assessment to determine the schools' teaching and learning needs. This approach leverages the successes PRDE has realized in implementing its SIG program. The resulting description of priority schools' needs will be consistent with the SIG needs assessment instrument that has been used in previous years (see attachment 14). This approach allows PRDE and its schools to build on the improvement efforts and capacity we have already developed and to reduce resource demands that would be necessary if a completely different course of action were selected.

The SIG/priority school needs assessment includes indicators across four measures of data: student achievement data, process data, demographic data, and perception data (see Exhibit 14). District level statisticians will provide school-based support to school staff for entering and interpreting data. Schools, with assistance from the appropriate district staff, will analyze data, summarize results, use the findings to identify the appropriate targets for intervention, and establish specific goals.

Exhibit 14. Needs Assessment Indicators

1. Student Achievement Data	<ul style="list-style-type: none">• percent of students at or above proficiency level in Spanish language arts on PPAA (Puerto Rico's USDE approved language arts test)• percent of students at or above proficiency level on PPAA in mathematics• student participation rate on the PPAA in Spanish language arts and mathematics• assessment results for all subgroup
2. Process Data	<ul style="list-style-type: none">• number of minutes in Spanish language arts courses• number of minutes in mathematics courses• number of non-highly qualified teachers (NHQT)

	<ul style="list-style-type: none"> • assignment of teachers to specific classes • teacher attendance rate • attendance rate, period of vacancy or extended absence of school director during previous two years • percentage of staff evaluated, results, and professional development plan • school practices that may interact with student characteristics
3. Demographic Data	<ul style="list-style-type: none"> • dropout rate • student attendance rate • discipline incidences • percentage of Limited Spanish Proficient (LSP) students • graduation rate • teacher attendance rate • number of highly qualified teachers (HQT)
4. Perception Data	<ul style="list-style-type: none"> • staff perception of school • parent perception of school • level of parent involvement

School Improvement Plans: Detailed Process and Roles

Priority schools will have support from Central and district level staff throughout the process of revising their CSP and developing their school improvement plan. District staff will validate that schools have used data from the needs assessment and engage the assigned external provider, working collaboratively with each priority school to develop a new school improvement plan. The desired output of these efforts is a CSP that includes a school improvement plan with specific interventions aligned to students learning needs and teachers professional development needs. Additional assistance throughout this process will be provided by the Office of School Improvement. Such assistance may include ensuring the alignment of proposed interventions with school needs and integrating priority schools’ plans with other system-wide curriculum and development efforts.

As indicated previously, each priority (including SIG) school partners with its own provider. There are only a limited number of cases where a provider has the capacity to serve more than one school and is doing so. It is important to note that schools are actively engaged in the process of selecting their preferred providers. This ensures that the assignment of priority schools to providers is based on the schools’ needs and the services offered by the providers. Additional oversight for this process is provided by the Office of School Improvement, which reviews each school’s request and ensures alignment between the schools’ needs and the providers’ services.

A team from the PRDE Office of Federal Affairs will be responsible for reviewing district implementation plans to ensure the interventions are appropriate and compliant with federal expectations. The Office of Federal Affairs realizes that district level plans must demonstrate a systemic change in the school and will include: school improvement planning, leadership quality improvement, educator quality

improvement, professional development, curriculum alignment and pacing, parent and community involvement, and monitoring plans and processes. Should a proposed plan that has been approved by a district not meet the Office of Federal Affairs review criteria, the district and school will be required to modify its plan. District staff will be required to participate in further development to ensure they develop the internal capacity to carry out this work effectively. Given the foregoing discussion, PRDE believes it has developed a system of tiered support to help schools identify specific strategies and carryout meaningful improvement efforts.

The Role of Providers

As has been indicated, an external provider will be assigned to each priority school to assist in developing and implementing the school improvement plan and ensuring said plan addresses the school's needs. Each priority school will have the opportunity to select its choice of provider after vetting by the district, region, and the Office of School Improvement.

External providers have a great deal of responsibility and mostly work with only one school during the intervention process. External providers are expected to:

- provide evidence of a proven track record—credible/valid results
- demonstrate expertise in evidence-based practices to build internal leadership capacity (scaffolded supports)
- provide research-based evidence of effectiveness in improving school performance (student and adult learning)
- demonstrate relevance to grade level and content areas and needs assessment data
- exhibit willingness to be held accountable for professional performance standards
- provide job-embedded professional development at leadership, teacher, and support staff levels to increase the capacity for improvement and sustainability tied to student achievement
- support community engagement programs
- demonstrate how they will collaborate with districts and schools
- demonstrate how they will collaborate with other partners and the community on a frequent basis
- demonstrate how they will build capacity at the local level when the intervention is completed

Implementation

Interventions defined in priority schools' CSP and school improvement plans will be implemented at the school level. PRDE recognizes that school-level plans will vary according to school needs and capacity. Each school has a provider assigned to consistently support the implementation of the interventions and the school improvement plan as a whole. This process leverages successful practices that have been implemented with Puerto Rico's SIG schools. The Office of School Improvement will assist, as needed, with implementation of the plan at the school level.

As indicated earlier in this section, PRDE will collect data on the implementation of interventions using the dashboard system. The SIG dashboard allows PRDE staff to monitor implementation progress on a monthly basis. This ongoing data collection is currently being funded with SIG dollars and was

developed for use in Puerto Rico's SIG schools. The dashboard will allow for the tracking of progress on 13 indicators of PRDE, district, and school goals. Over time, this data driven business process will allow for the system-wide identification and dissemination of successful implementation practices and lessons learned.

The 13 indicators were developed by the PRDE and are consistent with the list of indicators that (USDE provides States that need to report on the effectiveness of SIG programs). PRDE's SIG program indicators were discussed with the Planning Unit, the Office of the Undersecretary of Academic Affairs, Human Resources, EdFacts personnel, Title I and OFA. The selected indicators correspond to the data collected in the needs assessment (Exhibit 14) as described below:

Student Achievement Data

- ✓ School Improvement Status / Numbers of years in improvement
- ✓ Percent of students at or above proficiency level (basic & pre basic) on PPAA (Puerto Rico's AYP Test) in Spanish
- ✓ Percent of students at or above proficiency level (basic & pre basic) on PPAA in Mathematics
- ✓ Percent of students at or above proficiency level (basic & pre basic) on PPAA in English
- ✓ Student participation rate on the PPAA in Spanish, English and Mathematics
- ✓ Assessment results for special education students who take the PPEA (Puerto Rico AYP Test for special education)

Process Data

- ✓ School year in minutes
- ✓ Number of Non-Highly Qualified Teachers (NHQT)
- ✓ Teacher attendance rate
- ✓ Attendance rate, period of vacancy or extended absence of Director during previous two years
- ✓ Percentage of staff evaluated

Demographic Data

- ✓ Dropout rate
- ✓ Student attendance rate
- ✓ Discipline incidences

- ✓ Percentage of Limited Spanish Proficient (LSP) students

Perception Data

- ✓ Staff perception of school
- ✓ Parent perception of school
- ✓ Student perception of school

If PRDE finds indicators that a priority school is not making progress based on review of the SIG dashboard reporting, regular oversight and monitoring, annual reporting of student performance, and teacher evaluation data, it will require changes to the school improvement plan and district intervention plan. Changes will involve either 1) enhancing the interventions already selected, 2) adopting new interventions, or 3) ending interventions that are not producing results. PRDE can initiate this request at any time during the three years a school is a priority school. It is guaranteed to occur after the end of the initial three year period the school does not meet the exit criteria.

In the event that schools do not achieve the expected performance outcomes in 3 years, PRDE will re-evaluate the school's capacity to implement the turnaround interventions. First, PRDE will review evidence of implementation of planned initiatives. If planned interventions have not been implemented, PRDE's Central level staff will work with regional, district and school leadership/teachers to determine why interventions were not implemented. Structural, procedural or operational barriers to implementation will be identified and future interventions for these schools will be adjusted to ensure the observed barriers are addressed in the future.

If planned interventions have been attempted, PRDE's Central level staff will work with regional, district and school leadership and teachers to determine why performance targets were not attained. PRDE will then reinitiate the turnaround process and support the school identifying and selecting more effective interventions that have the greatest probability of closing the identified achievement gaps. The selection of new interventions must be based on the analysis of need and prioritization of goals and with respect to the school's demonstrated capacity to implement interventions during the previous 3 years. As is done with other schools, schools re-entering a 3 year cycle can only select interventions that align with PRDE's larger framework for school turnaround and are consistent with PRDE's plan to implement its content standards and implement related instructional practices. PRDE will only approve interventions that are clearly aligned with identified needs and can be reasonably expected to increase student achievement, close achievement gaps and improve the school's performance.

To further support implementation of the newly selected interventions, PRDE will facilitate the reassignment of school personnel to ensure optimal support for planned interventions. PRDE will also increase the level of technical and administrative support provided to these schools by the Central, regional and district levels.

Possible Interventions

Interventions for PRDEs existing 50 SIG schools (cohort I and cohort II) will be implemented as originally

planned because they have already undergone the review, oversight and validations processes discussed above. Details regarding the monitoring of these plans are presented in section 2G (page 123). The non-SIG priority schools will implement interventions and supports that are aligned with the transformation model of school turnaround. Again, PRDE affirms there is one type of priority school and signals its understanding of the need to manage the differences in timing for SIG schools that have already begun interventions.

The following discussion addresses possible interventions in non-SIG priority schools. These interventions are consistent with the turnaround principles as defined in the USDE document entitled *ESEA Flexibility*.

USDE turnaround principle 1: “providing strong leadership by: (1) reviewing the performance of the current principal; (2) either replacing the principal if such a change is necessary to ensure strong and effective leadership, or demonstrating to the SEA that the current principal has a track record in improving achievement and has the ability to lead the turnaround effort; and (3) providing the principal with operational flexibility in the areas of scheduling, staff, curriculum, and budget;”

Developing Effective School Leadership

Consistent with the Transformation Model requirements, the Office of School Improvement requires that a priority school review the performance of the school director and replaces the school director if such a change is necessary to ensure strong and effective leadership. Said reviews will take place before the beginning of each school year. All of the 29 cohort I SIG schools have replaced their school directors. The 24 cohort II school directors have been reviewed in 2013 and 13 were replaced. PRDE has conducted a review of the current school directors in the 24 cohort II schools. This review was done to ensure the cohort II schools could begin full implementation in 2013-2014 school year. In addition, PRDE has conducted a review of the 29 school directors who were newly assigned to cohort I schools. Based on the review of these principals, PRDE removed 12 of 28 principals from cohort I schools and a new Principal was hired for those schools for the 2013-2014 school year.

New directors in the cohort I schools participated in a Transformational Leadership Director’s Academy during the 2012-2013 school year. This Academy prepares Puerto Rico’s school directors to lead the transformational changes required to create successful learning communities and increase student achievement. Specifically, the Leadership Academy was developed as a highly interactive, engaging, hands-on, multi-layered approach to ensure that school directors are well-prepared to effectively lead the implementation of the Transformation Model in SIG schools, secure the necessary buy-in for change from stakeholders in their learning communities and leverage this federally-funded opportunity for sustainable student achievement. All the 26 directors who participated in the Leadership Academy assessed the experience as extremely valuable. Most of the directors not only said it was the best professional development they had received; they further noted that they had taken many ideas and practices presented during the training back to their school and implemented them immediately with positive results.

A list of actions related to the review of school directors appears below:

- Reviewed 28 cohort I SIG school directors after first year and 12 were not rehired – June 2013
- Reviewed 24 cohort II SIG school directors before first year and 13 were removed – April 2013

- Communicated the expectation to review additional priority school directors – November 2013
- Scheduled the review of all priority school directors by May 2014
- Completed review of all priority school directors by June 2014

Puerto Rico's legal and regulatory framework needs to be revised in order to facilitate the development of a pipeline to recruit, train and retain school directors with turnaround competencies and highly-skilled teachers. Currently, the recruitment of directors for SIG schools is performed by Special Recruitment procedures. Circular Letter 9-2010-2011 *Procedimiento para el Reclutamiento y Selección del Personal Directivo, Técnico, de Supervisión y de Facilitación Docente* states that when the need for the service is urgent and special qualifications are required for the position or when there are no eligible candidates, special procedures may be used for recruitment and selection. The ICAAE developed a School Director Leadership Program to identify and train excellent teachers who demonstrate the potential to become successful school directors with turnaround competencies. The program would identify and recruit candidates, provide intensive training and pair them with successful directors for a year of mentoring. Both mentor and mentee would receive a monetary incentive to participate in the program. Formal training will focus on leadership skills, school change and transformation, team work, conflict resolution, college- and career-ready standards, scientifically-based instructional practices, and supervisory and coaching skills. PRDE is currently evaluating its policy and regulatory framework to identify changes that would be necessary to implement this program. PRDE will meet with all relevant stakeholder organizations, to secure broad support. This process will be completed by the spring of 2014 and a final decision regarding the School Director Leadership Program would be made by then. Additionally, Puerto Rico is also in the process of consulting stakeholders and evaluating the possibility of establishing an Administrative Career Ladder.

PRDE is also preparing a Circular Letter that will clearly define the requirements of the Transformation Model adopted by the PRDE. The Circular Letter will provide the opportunity to all priority schools directors to participate of the staff recruitment process for existing vacant positions in their schools and identify candidates with the necessary skills to meet students' needs in transformation schools. It is expected that the Circular Letter will be released in May 2013.

As is the case with other jurisdictions, Puerto Rico's leaders are appropriately taking the needed time to seek input from stakeholders to refine and perfect the new evaluation systems. The new director and new teacher evaluation tools being developed by the PRDE will provide educators with a richer and more detailed view of their performance critical to building and supporting human capital in the schools and will allow schools to differentiate the job-embedded professional development they can provide to staff.

In order to ensure that teachers in priority schools are able to improve instruction, schools will be able to employ a reliable system for the purpose of having the best resource in the classroom to ensure students' best academic achievement. Spanish language arts and mathematics teachers hired at the school will be highly qualified and effective instructors.

Operational Flexibility

Priority schools will be provided with flexibility in scheduling, staffing, curriculum, and budgeting. Therefore, not only is the school director given operational flexibility, the entire school is provided a wide degree of flexibility in order to affect systemic change.

The district and school will provide evidence that a review of district and school practices and procedures has been conducted in collaboration with the school staff and stakeholders. The Office of School Improvement will examine, verify, and provide technical assistance to districts and schools throughout this process. Supporting the modification of practices and procedures that need to be modified to implement the interventions fully and effectively will include:

- providing differentiated support and resources for new teachers and teachers needing to improve their professional practice and effectiveness
- providing opportunities for staff to collaborate on a regular basis
- conducting annual staff evaluations

In addition, priority schools may benefit from funding flexibilities; depending on the classification of a school, a variety of federal funds can support non-SIG school interventions, such as 21st Century Community Learning Center funds which will support extended time and enrichment activities, 1003(a), as well as some Title I and Title II funds.

USDE turnaround principle 2: “ensuring that teachers are effective and able to improve instruction by: (1) reviewing the quality of all staff and retaining only those who are determined to be effective and have the ability to be successful in the turnaround effort; (2) preventing ineffective teachers from transferring to these schools; and (3) providing job-embedded, ongoing professional development informed by the teacher evaluation and support systems and tied to teacher and student needs;”

Teacher Effectiveness

PRDE’s proposal for revising its teacher and director evaluation system is presented in great detail under Principle 3. All of the elements outlined under, which include reference to reviewing the quality of staff and making personnel decisions including preventing ineffective teachers from transferring, apply to this section.

PRDE believes that in order to provide its directors and teachers with fair and meaningful evaluations, educators must receive ongoing training and support for the implementation of PRDE’s basic curriculum, as well as professional development for new or revised instructional programs and practices that are aligned with the school’s instructional plan and selected strategies. Instructional support will be provided for staff members, such as observation of classroom practices, in-class coaching, mentoring, provision of structured common planning time, and consultation with external experts. These decisions will be made on a case-by-case basis based on ongoing observations and oversight of teaching and learning. This decision making process will take place at the Central level and involve close collaboration with the district level staff. This approach is consistent with PRDE’s internal organization and appropriate given the fact that the Central office fulfills the roles of an SEA and LEA.

In order to ensure that job-embedded professional development occurs and that the development is

tied to teacher and student needs, schools will create Individual Professional Development Plans for teachers of targeted subgroups. The professional development included in these plans will target the needs of specific subgroups and will be consistent with the professional development outlined in schools CSP and school improvement plans. Schools must also ensure that appropriate resources are provided to redesign the master schedule to allow for professional development opportunities that could take place during common planning time, data driven decision making sessions, and job-embedded professional development.

USDE turnaround principle 3: “redesigning the school day, week, or year to include additional time for student learning and teacher collaboration;”

Extended Time and Community Involvement

Schools CSP and improvement plans must include the extension of the instructional day and common teacher planning time and enrichment activities for students. In order to provide additional time for student learning, priority schools must extend the learning day. Extending the instructional day, week, and year will be used as a strategy to increase student achievement allowing schools to establish academic intervention programs at the moment students begin to struggle with subject content. All 29 cohort I SIG schools have extended learning time by at least 1 hour per day, and a large majority of these schools will also provide summer programs to their students in summer 2013. Given that PRDE has been able to implement this practice in SIG schools, it will be able to apply this approach to all priority schools.

In order to sustain a school that supports positive student performance outcomes, a school must first create an atmosphere that is safe and conducive to teaching and learning. Surveys will be conducted to help staff identify student, family, and community needs and priorities. Schools will communicate with parents and the community about school improvement status and plans, and resources available such as health, nutrition, or social service providers utilizing newsletters, parent outreach coordinators, and direct mail. All of these efforts will be aligned and integrated with lessons learned from the school culture projects discussed earlier under this Principle.

As part of the development of its CSP and the school improvement planning process, schools are required to recruit representatives from the community to establish a Community Assessment Team (CAT). This CAT is comprised of a schools’ planning team (the leadership team) and the school council (parents and community members). Together, the CAT, district leaders, and the schools’ provider review school performance data, determine the cause for low performance for their priority school, and advise the school on its plan. This structure empowers school stakeholders to take ownership of the schools’ intervention plan and the activities that are carried out in their school. Historically, PRDE has enjoyed great success with this approach and has a track-record of including community/parent input in the development of CSPs.

The Office of School Improvement is available to provide technical assistance to CAT. As is practical and feasible, in instances where multiple schools in a feeder pattern be in priority status, the same Community Assessment Team will be used for all the priority schools in that feeder pattern. This will ensure vertical alignment of interventions. By focusing attention on critical areas and channeling resources towards a core set of practices, PRDE expects to generate increased internal capacity in the schools to fully implement planned interventions.

USDE turnaround principle 4: “strengthening the school’s instructional program based on

student needs and ensuring that the instructional program is research-based, rigorous, and aligned with State academic content standards;”

Comprehensive Instructional Improvement Initiatives

Interventions aimed at achieving systemic change, especially in priority schools, are necessary to improve instruction. Priority schools are required to develop and implement comprehensive research-based strategies that are aligned with the unique needs of their teachers and students. In all PRDE schools, improvement strategies must be designed to address a specific need or needs identified through the needs assessment. PRDE’s central and district level has created oversight mechanisms that ensure approved improvement strategies (i.e., the technical assistance, consultation, review and monitoring provided by Central and district level staff and the Office of School Improvement discussed earlier) represent a meaningful change will improve student achievement from prior years. In all schools, PRDE is focusing educator attention on those interventions that represent a significant reform and go beyond the basic educational program that has been utilized by the school in prior years.

In order to implement these strategies, the school must utilize instructional materials and practices that are aligned to state standards and review data to determine the effectiveness of all instructional programs and class offerings. PRDE staff from the Office of the Undersecretary of Academic Affairs is providing ongoing support and resources related to the development, dissemination and use of standards-based curriculum materials. School improvement processes established at the district levels and oversight practices provided by the Office of the Undersecretary of Academic Affairs and Federal Affairs ensure that schools demonstrate how they are aligning its initiatives and resources based upon their specific needs.

Schools are expected to disaggregate achievement results and identify the student groups that are not making adequate progress. If LSP, students with disabilities, and/or students with low graduation rates are identified as not making adequate progress, our expectation is that the improvement strategies include specific interventions for these groups of students. The interventions should be research-based and specific to their schools’ greatest performance challenges and the root causes of those challenges. In all instances, and consistent with the review and oversight principles being applied at the Central and district levels, schools will ensure that their instructional program is research-based, rigorous and aligned with the standards. Throughout the implementation of the turnaround efforts, PRDE will periodically assemble task force of consultants (to include representatives of identified subgroups) that will analyze local school needs and provide targeted feedback to schools, of appropriate interventions and supports. They will also provide recommendations for targeted professional development for teachers and school directors.

To address the needs of LSPs, students with disabilities and any other group identified as not making adequate progress, schools may attempt to strength its instructional program by

- Using formative assessment designs and data analysis to improve and differentiate instruction
- Redesigning the school day, week or year to include additional time for student learning and teacher collaboration
- Building capacity for school leaders focused on instructional leadership by focusing on the collection and use of performance data to provide feedback mechanisms for continually

improving instruction

- Implementing a teacher evaluation process to ensure that teachers are effective and able to improve instruction
- Preventing ineffective teachers from transferring to Priority Schools
- Providing job embedded ongoing professional development that is informed by the teacher evaluation tied to teacher and student needs
- Addressing other non-academic factors that impact student achievement, such as students' social, emotional, and health needs
- Providing professional development for all staff on the effective support of students with disabilities and LSPs and their families
- Providing opportunities for parent and community involvement in the decision making process regarding curriculum, assessment, reporting, and school environment

District level support will collaborate with and closely monitor all schools' implementation of turnaround efforts to ensure schools are teaching to challenging standards; that instruction is sufficiently rigorous; and that educators have access to aligned curriculum, instructional supports as well as the professional development necessary to address the particular needs of students in identified sub groups. As has been indicated, interventions will be regularly monitored by PRDE staff to ensure that all schools are implementing interventions effectively and making progress towards increasing student achievement including LSP, students with disabilities and other student groups with low graduation rates.

USDE turnaround principle 5: "using data to inform instruction and for continuous improvement, including by providing time for collaboration on the use of data;"

Data Driven Decision Making

Data driven decision making must drive instruction in schools. PRDE recognizes that data collection and data-driven decision making is challenging for PRDE schools. Our efforts to develop new dashboards evidence our commitment to making it possible for all actors within the PRDE system to use data to make effective educational decisions. Within the past two years, staff in SIG schools have demonstrated increased capacity to understand the need for the collection and use of reliable data. Recognizing this success, PRDE continues supporting faculty and staff in the use of data and are ensuring that student data becomes the center of instruction.

PRDE will provide supports to schools implementing these turnaround principles that is similar to what is being provided in SIG schools. This support will ensure that all priority schools have real-time access to student achievement data to inform decision making about the implementation of CSP and school improvement plans.

Data analysis professional development activities will be conducted with staff from districts and schools following baseline, mid-year, and mini assessments. As is the practice with SIG schools, priority schools

will use data from interim and summative assessments. PRDE Central and district level staff will provide supports so that priority school staff can make informed decisions regarding the frequency of such assessments, how the data will be analyzed, and how changes in instruction will be monitored.

Priority schools’ data driven instructional improvement plans will also include explanations of how schools will ensure instruction is differentiated to meet the individual needs of students and how such differentiation will be monitored.

Finally, all priority schools will implement the following interventions: 1) all schools will have a data wall., 2) school directors will do walkthroughs and teacher observations to monitor progress, 3) surveys will be distributed to teachers, students, and parents at the beginning of the school year and at the end of the school year, 4)

PRDE’s Monitoring Unit will continue to conduct monitoring visits at the school level and report on the progress made within the schools, including the use of data and teacher planning.

USDE turnaround principles 6 and 7: “establishing a school environment that improves school safety and discipline and addressing other non-academic factors that impact student achievement, such as students’ social, emotional, and health needs; and providing ongoing mechanisms for family and community engagement.”

As has been described previously in Principle 2, PRDE schools have begun to implement a number of innovative activities aimed at creating a positive school environment and connecting our schools to the communities in which they are located. These activities are designed to provide enriching experiences to our students, engage families in the education of their children, and link schools and communities to create a system of supports for neighborhood children. Some of these activities include: the development of school newspapers that provide students with an opportunity to engage in and describe what is happening in their communities; and programs for parents including preparation for high school diplomas, computer training, and volunteer opportunities.

These general school climate interventions will be complimented by efforts to implement 1) school culture recommendations, 2) recommendations from parents and other members of the school community, 3) special programs that are identified/designed as a result of the schools’ needs assessment and 4) recommendations from external providers assigned to the school. In all cases, school interventions will be aligned with all the turnaround principles as integrated in the PCE and reflected by the range of additional interventions described below.

Turnaround Principles	PRDE’s Comprehensive Plan	Sample/Related Interventions	Party or Parties Responsible
Strong Leadership	Goal 3 – Highly Qualified Human Resources Recruit and retain faculty and staff highly competent and qualified, and provide training and ongoing	The ICAAE has developed a School Director Leadership Program to identify and train excellent teachers who demonstrate the potential to become successful school directors with turnaround competencies. The program would identify and recruit candidates, provide intensive training and pair them with	ICAAE

	professional development focused on coaching and mentoring strategies toward improving the quality of teaching and learning processes and administrative processes through various forms of training (including the use of technology).	successful directors for a year of mentoring.	
		Puerto Rico’s comprehensive school director evaluation system will capture the work of the school director performing those instructional leadership actions that directly impact student performance (i.e., mentoring, coaching, and working directly with teachers and students). Measures of student achievement and growth will be an integral part of this evaluation system.	District Superintendents
		When the school director’s summative evaluation results indicate a performance at the lower levels, the school director will be placed on an Individual Professional Growth Plan. This plan will be developed by the evaluation committee and will be in effect for a period of two years. If necessary, the PRDE will begin the process to take administrative personnel actions.	Undersecretary of Academic Affairs Secretary of Education
Effective Teachers	Goal 3 – Highly Qualified Human Resources	Beginning in the 2015-2016 school year, all teachers will be evaluated annually. The new teacher evaluation tools being developed by the PRDE will provide educators with a richer and more detailed view of their performance critical to building and supporting them and will allow schools to differentiate the job-embedded professional development teachers really need. Measures of student achievement and growth will be an integral part of this evaluation system.	School District Superintendents
	Recruit and retain faculty and staff highly competent and qualified, and provide training and ongoing professional development focused on coaching and mentoring strategies toward improving the quality of teaching and learning processes and administrative processes through various forms of training (including the use of technology).	When the teacher’s summative evaluation results indicate a performance at the lower levels, the teacher will be placed on an Individual Professional Growth Plan. This plan will be developed by the evaluation committee and will be in	Undersecretary of Academic Affairs Secretary of Education

		effect for a period of two years.	
		Teachers will receive ongoing PD in curriculum implementation, research-based instructional practices and strategies, use of data to inform instruction linked to teacher and student's needs.	InDePM, Academic Programs Directors
		Teachers with 0-3 years of experience will benefit from ongoing on-site professional development (coaching) and Mentoring Programs.	School District Academic Facilitators
		After two years, the teacher that is rated at the lower levels ("partially meets expectation" or "does not meet expectations") will be subject to personal actions as correspond, including disciplinary measures directed to intervene with the deficiencies identified on the evaluation and guarantee the academic achievement of students.	Secretary of Education
Redesigned schedules to include additional time for student learning and teacher collaboration	Goal 1 – Development of Students' Knowledge, Skills and Attitudes. Increase retention rates and academic achievement and develop students' knowledge, skills and attitudes	All schools have the option to increase instructional time by implementing extended hours programs and tutoring (e.g., assigning part of their budget to such activities, applying for additional funding, partnering with community-based organizations). School Directors may rearrange teachers' schedules to increase student contact hours without hiring additional staff.	School Directors Office of Federal Affairs External providers
		Circular Letter 10-2012-2013 creates new opportunities for teacher collaboration assigning the second Friday of each month for teachers' team meetings. This regulation also increases planning and professional development time for teachers.	Office of the Undersecretary of Academic Affairs School Directors
Rigorous and aligned instructional program	Goal 1 – Development of Students' Knowledge, Skills and Attitudes. Increase retention rates and academic	The implementation of PRDE's policies, procedures and strategies, on-going professional training and on-site school support will be the primary tools for effective teaching aligned to PRDE's rigorous standards.	Office of the Undersecretary of Academic Affairs Academic Programs Directors

	achievement and develop students' knowledge, skills and attitudes		School Districts
		The Standards & Assessment Unit in coordination with the Academic Programs Directors will lead an effort to improve teacher training with an eye for promoting teachers' understanding of the curricular materials (standards, expectations, scope and sequence, curricular maps, Curricular Renovation Guidance and curricular frameworks) and their use in the classroom.	Standards & Assessment Unit Office of the Undersecretary of Academic Affairs Academic Programs Directors School District Academic Facilitators
Use of data for continuous improvement	Goal 5 – Strengthening Institutional Administrative and Fiscal Procedures Identify and establish a clear and precise agenda for addressing pressing problems; identify short-term measures that would lead to an effective and agile articulation of administrative and fiscal systems that impact academic goals.	Similar to SIG schools, priority schools will have real-time access to student achievement data (baseline and mid-year benchmark assessments, and teacher created mini assessments). Data analysis activities will be conducted with the participation of districts, school administration, and teachers following baseline, mid-year, and mini assessments.	School Superintendent School Director
		Priority schools PCE will describe the interim and summative assessments that will be used, the frequency of such assessments, how the data will be analyzed, and how changes in instruction will be monitored. The plan will also include how instruction will be differentiated to meet the individual needs of students and how such differentiation will be monitored.	School District Academic Facilitators
		PRDE will support teachers' use of data to differentiate instruction and attend individual student's needs including the use of individual growth information in decision making.	School District Statisticians School Directors
		Parents will receive an individual student performance report and school will be responsible for their distribution and discussion.	School Directors
		Teachers will receive student	Standards &

		individual data to attend to individual student's needs.	Assessment Unit
Safe learning environment	Goal 2 – Learning Conditions	Implement the School Local Welfare Policy in every school and demonstrate compliance with the provisions of federal and state laws to improve the quality of available food served in public schools and other private educational institutions.	School Directors
	Provide teachers with additional technological tools that offer greater flexibility and variety, maximizing the use of technology and expanding educational resources; improve the physical infrastructure of schools, and provide safety and support to the school community.	Collaborate with municipalities, community organizations, the private sector, and/or state or municipal police to ensure a safe environment in all schools, at all times free of drugs, weapons, alcohol and violence.	School District
Family and community engagement	Goal 4 – Efficient Integration of All Components of the School Community	Implement activities aimed at creating a positive school environment and connecting our schools to the communities in which they are located. These activities will provide enriching experiences to our students, engage families in the education of their children, and link schools and communities to create a system of supports for neighborhood children. Activities may include: the development of school newspapers that provide students with an opportunity to engage in and describe what is happening in their communities; and programs for parents including GED courses, computer training, and volunteer opportunities.	Undersecretary of Academic Affairs School Districts School Directors Teachers Resource Center for Parents and Guardians (CREMPE in Spanish)
	Promote and strengthen the participation of students, mothers, fathers or guardians, teachers, school administrators, government agencies, nonprofit organizations and the private sector in the educational processes of the Department of Education towards generating general consensus.	Provide opportunities for family support and learning through the Resource Center for Parents and Guardians (CREMPE in Spanish)	CREMPE Coordinators

Schools that Fail to Improve after Full Implementation of Interventions

Priority schools that fail to improve academic achievement after full implementation of interventions will be considered for additional measures to safeguard students' right to quality public education. *Reglamento No 6743 del Personal Docente del DEPR*, as amended by *Reglamento 7292* and *Reglamento 8037*, establishes the procedures for relocating PRDE personnel. *Reglamento No. 7565 de Medidas*

Correctivas y Acciones Disciplinarias regulates disciplinary actions that PRDE can take against personnel that are not fulfilling their duties guaranteeing due process. Ultimately, Law No. 149 *Ley Orgánica del Departamento de Educación de Puerto Rico del 15 de Julio de 1999 as amended*, assigns responsibility for the closing of schools to the Secretary of Education.

In the event that schools do not achieve the expected performance outcomes in 3 years, PRDE will re-evaluate the school's capacity to implement the turnaround interventions. First, PRDE will review evidence of full implementation of planned initiatives. If planned interventions have not been fully implemented, PRDE's Central level staff will work with regional, district and school leadership/teachers to determine why interventions were not fully implemented. Structural, procedural or operational barriers to implementation will be identified and future interventions for these schools will be adjusted to ensure the observed barriers are addressed in the future.

If planned interventions have been attempted, PRDE's Central level staff will work with regional, district and school leadership and teachers to determine why performance targets were not attained. PRDE will then reinitiate the turnaround process and support the school identifying and selecting more effective interventions that have the greatest probability of closing the identified achievement gaps. The selection of new interventions must be based on the analysis of need and prioritization of goals and with respect to the school's demonstrated capacity to implement interventions during the previous 3 years. As is done with other schools, schools re-entering a 3 year cycle can only select interventions that align with PRDE's larger framework for school turnaround and are consistent with PRDE's plan to implement its content standards and implement related instructional practices. PRDE will only approve interventions that are clearly aligned with identified needs and can be reasonably expected to increase student achievement, close achievement gaps and improve the school's performance.

To further support implementation of the newly selected interventions, PRDE will facilitate the reassignment of school personnel to ensure optimal support for planned interventions. PRDE will also increase the level of technical and administrative support provided to these schools by the Central, regional and district levels.

- 2.D.iv Provide the timeline the SEA will use to ensure that its LEAs that have one or more priority schools implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year and provide a justification for the SEA's choice of timeline.

Ensuring Implementation

As stated before, PRDE functions as a single LEA with a service structure that organizes the island into seven regions comprising 28 smaller districts (academic arms of the PRDE). The Office of School Improvement has begun implementation of interventions for SIG priority schools with all reasonable haste. PRDE believes the students in these schools cannot and should not be expected to wait another year before their schools begin to improve.

Non-SIG priority schools will begin full implementation of interventions designed to improve student achievement in the 2014-2015 school year. All preparatory work, including removing school

directors, hiring and training new directors, vetting and selecting providers, performing needs assessment and preparing intervention plans took place during the 2012-2013 school year. The timelines described below are either based on current SIG timelines or the most aggressive timeline that PRDE thinks is feasible. Though the following discussion differentiates between SIG and non-SIG schools, there is but one type of priority school as previously described

SIG Priority Schools

As has been indicated, 28 cohort I SIG schools have already begun implementation of the transformational model during the 2011-2012 school year and are required to implement the interventions for the remaining two years. Additionally, 24 cohort II SIG schools will begin implementation during the 2013-2014 school year, and are required to implement the model for three years. Pre-implementation activities for cohort II schools—were completed—during the 2012-2013 school year. The 2013-2014 School Year will be a planning year and interventions with NON-SIG priority schools will begin in the 2014-2015 School Year. Current cohort II SIG schools now entering their 1st year will continue to receive support through 2015-2016.

The 20 Non-SIG Priority Schools Timeline

Activity	Date
Students’ PPAA test results released	June 2013
Schools are placed in the appropriate category	July 2013
List of schools is released	When ESEA Flexibility package is approved
Orientation to districts and schools about the new interventions and plan requirements for removal of directors	Two months after list of priority schools is released
Intervention plan submission	Three months to prepare plan after list of priority schools is released
Intervention plan approval	One month to grant approval after submission of intervention plan
Intervention plan implementation	One month after approval of intervention plan
Monitoring and support	Ongoing during these three years
Continued monitoring and support	Two years after exit from priority status

A description of monitoring activities for priority schools can be found in section 2G on pages 123-132.

- 2.D.v Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement exits priority status and a justification for the criteria selected.

Exit Criteria for Priority Status

Compliance and operational monitoring occurs frequently and on an ongoing basis and has been described throughout PRDE's response to Principle 2. However, PRDE believes that significant milestones are most easily observed on an annual basis due to the structure of schooling and the systems of assessments involved. The following indicators of progress, which are consistent with the 13 indicators included on the SIG dashboard detailed above, will be monitored annually for all priority schools and used to make midcourse corrections to the school improvement plan:

- number of AMO targets met and identification of which targets are met compared with previous years
- changes in proficiency rates across the school by subject
- changes in the percent of students making or exceeding their growth target
- gaps in the percent of students meeting or exceeding their growth targets by subgroup
- trends of student performance as broken down by teacher (as detailed in principle 3)
- trends in teacher evaluation results and supports implemented for teachers whose evaluation is below standard

These annual monitoring indicators will help inform the school, district, and SEA of the progress of the school and provide objective measures for use in modifying the school improvement plan if necessary. Specific actions that will be taken in the event that schools do not make progress after three years have been presented above.

Schools will remain in priority status for a minimum of three years. At the end of those three years, a school may exit priority status if, in the current academic year, it has met the AMOs for all subgroups in the school and if a high school has achieved the higher of an absolute graduation rate above 60% or an improvement in the graduation that is one half of the difference between the starting/baseline graduation rate and 100%. These exit criteria were chosen based on the following:

- They provide enough time for interventions to take hold and become part of the school culture.
- They indicate that the school is performing at a level on par with rigorous expectations.
- They meet any other applicable federal guidelines for other grant programs.

2.E FOCUS SCHOOLS

2.E.i Describe the SEA’s methodology for identifying a number of low-performing schools equal to at least 10 percent of the State’s Title I schools as “focus schools.” If the SEA’s methodology is not based on the definition of focus schools in *ESEA Flexibility* (but instead, e.g., based on school grades or ratings that take into account a number of factors), the SEA should also demonstrate that the list provided in Table 2 is consistent with the definition, per the Department’s “Demonstrating that an SEA’s Lists of Schools meet ESEA Flexibility Definitions” guidance.

Selecting Focus Schools

In keeping with the guidelines for the flexibility request as addressed in the USDE documents entitled *ESEA Flexibility* and *ESEA Flexibility Frequently Asked Questions*, Puerto Rico plans to use identify a minimum of 10% of schools as a Focus School. The proposed identification of schools applies to all schools, regardless of Title I status. Given that only 18 schools within the Puerto Rico system are non-Title I schools, this decision will have minimal impact on schools identified. Puerto Rico served 1,457 Title I Schools in 2010-11; thus, the number of Focus schools identified will be a minimum of 146 or 10% of the schools.

PRDE will identify Focus schools as:

1. High schools with three-year adjusted cohort graduation rates equal to or greater than 50% and less than 60% (i.e., schools with graduation rates between 50-59%), **OR**
2. The 10% of schools with the largest overall achievement gap between the 25th and 75th quartiles and lacking progress in proficiency for the 25th quartile group when comparing previous year to the current year.

Once a school is identified as a focus school, it will remain in this status for at least three years. The three year time period is intended to ensure that the interventions focus schools implement will have time to become part of the school culture and result in sustained improvements in teaching and learning. The criteria required to exit focus status are contained in section 2Eiv below. If a focus school fails to make progress after a period of three years, PRDE will apply the process used with priority schools that fail to make progress (detailed above).

The number of focus schools will not exceed the 10% of all schools. As such, once a school is identified as a focus school, additional schools will not be identified in this category until at least one school exits focus status. This approach is similar to what PRDE proposes for its priority schools and is based on a realistic assessment of the overall system’s capacity to provide meaningful and effective supports to schools with teaching and learning needs. As schools exit focus status, schools with the largest in-school gaps for the previous two years will be identified based on the rank order of the within-school gaps of non-priority schools.

2.E.ii Provide the SEA’s list of focus schools in Table 2.

Table 2 is included as Attachment 9 located on page 118.

- 2.E.iii Describe the process and timeline the SEA will use to ensure that each LEA that has one or more focus schools will identify the specific needs of the LEA's focus schools and their students. Provide examples of and justifications for the interventions focus schools will be required to implement to improve the performance of students who are the furthest behind.

Process for Identifying Focus Schools Needs

Beginning with the identification of a school as a focus school the following will occur:

- The school will, under the guidance of the Office of the Undersecretary of Academic Affairs, complete the FLICC needs assessment as detailed above
- Staff within the Office of the Undersecretary of Academic Affairs will collaborate with the school in selecting meaningful interventions that address the issues identified by the needs assessment that focus primarily on those needs associated with the performance of those groups of students who are not meeting the level of proficiency associated with higher performing groups.
- The school's action plan for continuous improvement will be modified to include the most appropriate interventions.
- The school will begin the interventions and benefit from support from the Office of the Undersecretary of Academic Affairs.

The Office of the Undersecretary of Academic Affairs will ensure that focus schools conduct a diagnostic needs assessment. The final CSP and action plan that each focus school develops will be reviewed and approved by the Office of the Undersecretary of Academic Affairs and the external evaluator. Focus schools' action plans will include analysis of achievement data, evidence of alignment between identified teaching and learning needs and propose interventions, and details on implementation of proposed interventions. Focus schools' action plans must also demonstrate the capacity to result in change in the school and will be expected to include: planning for the improvement of the school, leadership quality improvement, educator quality improvement, professional development, curriculum alignment and pacing, parent and community involvement, and monitoring plans and processes.

PRDE will leverage the expertise of the external evaluator to ensure that focus schools' selection of interventions are supported by relevant and appropriate data that align with expected outcomes. The external evaluator enable PRDE to determine that implementation of these plans to ensure that the plans are appropriate, being implemented with fidelity, and having the intended impact on student performance.

Using the Needs Assessment

All focus schools will undergo a comprehensive needs assessment using a model that was developed by the Florida and Islands Comprehensive Center (FLICC).

The FLICC assessment collects perception data based on classroom observations and surveys of school directors, school administrators, teachers, and students (see attachment 15). After schools complete

the needs assessment, they will summarize the findings and determine the root causes that require intervention. Next, schools will establish goals. School profiles will consist of leading indicators and other significant data identified by the SEA from those listed in the following chart (see Exhibit 15).

Focus schools will use historical information and outputs from the comprehensive needs assessment to modify their Comprehensive School Plan (CSP) and develop an action plan. The design and elements included within the CSP are detailed under PRDE’s response to Principle 1. The revisions to the CSP related to the development of the school’s action plan include: 1) enhancing each school’s action plans to reflect attention to the need to evidence continuous improvement 2) the inclusion of significant interventions that modify past approaches to teaching and learning and 3) detailing the support the school will need from PRDE’s academic program directors in the Office of the Undersecretary of Academic Affairs. Taken together, these revisions provide a multi-pronged approach to addressing the factors that contributed to observed achievement gaps.

Exhibit 15. FLICC Needs Assessment Indicators

Perception Data	<ul style="list-style-type: none"> • Alignment of instruction, planning, and materials with Puerto Rico’s standards and expectations • Effective teaching strategies • Formative and summative assessments • The use of achievement data • School climate • Parent involvement • Student engagement • School leadership • The needs of special populations (LSP students and students with disabilities) • Teacher evaluations, feedback loops, and professional development • Use of financial and other resources (materials, technology, libraries, etc.)
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The various staff within the Office of the Undersecretary of Academic Affairs will support implementation of action plans by focus schools. Staff from the Office of the Undersecretary of Academic Affairs, will provide ongoing technical assistance related to teaching and learning and ensure that implementation data are reported through the PRDE dashboard system. By providing this support to focus schools, PRDE’s Central level can monitor progress among focus schools on a monthly basis and engage supports throughout the school year as deemed necessary based on available performance data. Where implementation successes are identified, use of the PRDE dashboard will facilitate identification and dissemination of successful implementation practices and lessons learned.

Interventions

Focus schools will begin implementation of interventions designed to improve student achievement during the first semester of the 2013-2014 school year. To this end, preparatory work has taken place

during the 2012-2013 academic year.

PRDE intends for its focus schools to begin implementation of interventions designed to improve student achievement during the first semester of the 2013-2014 school year. The timeline for implementation is contingent on approval of this Flexibility Waiver application. PRDE desires to have its focus schools plan and implement the desired interventions as soon as possible after receiving approval by the Department of Education. To this end, preparatory work has taken place during the 2012-2013 academic year. This preparatory work included identifying focus schools, analyzing achievement data to determine trends in students' learning needs, developing a list of interventions that would be appropriate given the demonstrated teaching and learning needs in these schools, and reviewing existing curricular and instructional materials to determine how these existing resources could be used differently in identified schools.

Once PRDE's Flexibility Waiver is approved, PRDE will work with US Department of Education staff to modify timelines as needed to ensure compliance with ESEA Flexibility requirements. In addition, PRDE will engage in the following preparatory work in the first two months: First month following approval: conduct a meeting with focus schools to review requirements, provide an orientation regarding the FLICC needs assessment; and provide recommendations for use of curricular materials based on schools' specific needs; Second month following approval: conduct FLICC needs assessment and review results; meet with focus schools to review their findings and plans, provide feedback and approve; assign appropriate district level resources to schools, set implementation targets and schedule onsite visits.

A PRDE cannot provide a comprehensive list of possible interventions from which all schools can select as such a list is both impossible and impractical. Indeed, the literature on effective practices and school reform provide too many possible interventions for such a list. PRDE's goal is to have focus schools select interventions that directly correlate to observed student and school needs.

Nevertheless, PRDE will require focus schools to select research-based interventions and use interventions that meet the evidence and impact criteria from the What Works Clearinghouse. By establishing such a rigorous standard for interventions, PRDE is signaling the importance of interventions that address the issues underlying poor student achievement and growth gaps in focus schools. It should be noted that all of the best practices recommended in support of the implementation of turnaround principles can be used to support improvement efforts in focus schools.

PRDE will leverage all available instructional, curricular and human resources to provide support and oversight that helps focus schools to fully implement interventions. PRDE recognizes that the interventions in focus schools should address the specific needs of the students in their lower performing groups and those that are most likely to succeed given the local context of the school. Ultimately, by applying the right interventions to meet the identified needs of the school, we will better empower the school in assisting students in becoming college and career ready. The Office of the Undersecretary of Academic Affairs will provide significant attention to the needs of focus schools, making decisions and recommendations that are appropriate for PRDE's differentiated accountability system and consistent with practices that have been proven effective in other schools.

The Office of the Undersecretary of Academic Affairs will ensure that, focus school substantiate how the selected interventions meet the following criteria:

1. There is a research base supporting their usage.

2. The intervention has a differential impact such that it is likely to improve the performance of the lower performing subgroups in the school.
3. The intervention is tied to the process data from the needs assessment that is most likely to be linked to the performance of the lower performing subgroups in the schools.
4. There are designated monthly milestones allowing an academic facilitator (with oversight by the external evaluator) to monitor that interventions are occurring and working. These will include a variety of student performance indicators to substantiate the students in the lower performing subgroups in the school are progressing at a rate that should lead to decreased student performance gaps at the time of state testing.

For example, a school facing challenges improving the academic achievement of students with disabilities would need to select a research-based intervention that addresses the needs of students with disabilities. A possible intervention would be to provide professional development to general education teachers on the inclusion of special needs students in the general education classroom and professional development to special education teachers on academic content and standards. Such an intervention would be required to have a monitoring plan. Interim assessments would be used to monitor the performance of special needs students. Data would be reviewed at least monthly to ensure these students are progressing. Progress monitoring would be required for this intervention to demonstrate that teachers are using the skills from the professional development to better meet the learning needs of special needs students in their classroom.

Although no list of interventions can be comprehensive due to the context factors specific to a given school and the performance of all students in the school, the following list is indicative of the types of interventions expected to address the learning needs of the group of students identified through the gap analysis:

- Recruiting and training high performing staff that have demonstrated the ability to improve the performance of those students most in need, often LSP students and SWDs.
- Changing the instructional model to a research based model that has demonstrated particular success with the group of students most in need in the school, possibly LSP or SWD.
- Modification of the school day to better address the needs of the students.
- Participation in job embedded professional development with specific objectives and measures tied to student achievement.
- Training for the school director and staff on data use.
- Addressing specific subgroup needs, such as increased instructional supports for LSP or SWD students.
- Increasing the amount of academic learning time in the school day or year.
- Providing systems to support the social and emotional wellbeing of students.

To further support these schools, the Office of the Undersecretary of Academic Affairs will reach out to community leaders, including those from local foundations, businesses, universities, and other sectors

of the community at-large, to encourage them to work with focus schools. This is the direct result of feedback received from community leaders during the August community leaders' forum where participants expressed the desire to work with local schools to support their development.

It should be noted that these same expectations for selecting interventions also apply to priority schools. The expectations for focus schools are detailed here to provide visibility into how PRDE will ensure focus schools, which do not work with external providers, will receive sufficient support to ensure their intervention plans address relevant issues.

Monitoring to Ensure Implementation

Ongoing monitoring of the interventions will be a part of the action plan for continuous improvement. Ongoing monitoring must be included in order for a focus school's action plan to be approved. The Office of the Undersecretary of Academic Affairs and the external evaluator will review focus schools' implementation efforts and identify areas where the planned interventions do not appear to meet student learning needs. In those cases, information will be fed back to the school for modification of either the plan or the implementation strategy to ensure success for the students and the school.

Focus schools will be responsible for providing evidence of the implementation of their action plan s every three months. This evidence will inform desktop monitoring to be conducted by the Office of the Undersecretary of Academic Affairs. In addition, the external evaluator will monitor the schools directly via site visits at least once a year.

Under ESEA flexibility, the PRDE will shift from having 1,321 schools in various stages of improvement, to 146 schools in focus status. Reducing the total number of schools that require direct and significant intervention will make is possible for the Office of the Undersecretary of Academic Affairs, with assistance from the external evaluator, to work with schools in meaningful ways, monitor implementation of interventions, develop protocols, interpret results of monitoring, and engage in other key oversight activities.

- 2.E.iv Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status and a justification for the criteria selected.

Exit Criteria for Focus School Status

PRDE will use the same success criteria for focus schools being used with priority schools. PRDE selected this approach to ensures uniformity in the application of its differentiated accountability system, streamline the process of performance monitoring, and make optimal use of existing human resources and procedures. However, focus schools must demonstrate that they have improved academic achievement in those areas that resulted in their identification as a focus school and based on results of needs assessments. In addition, the selected outcome criteria are expected to be valid indicators of students' college and career readiness (see full discussion of University of Puerto Rico's assessment for PRDE's standards presented under Principle 1 for more information).

As has been indicated above, while PRDE believes that compliance and operational monitoring can be done on an ongoing basis, significant milestones should be assessed on an annual basis. The following indicators will be monitored for all focus schools and used to make midcourse corrections to

the action plans for continuous improvement:

- changes in proficiency rates across the school by subject
- changes in the percent of students making or exceeding their growth target
- gaps in the percent of students meeting or exceeding their growth targets by subgroup
- trends of student performance as broken down by teacher (as detailed in principle 3)
- trends in teacher evaluation results and supports implemented for teachers whose evaluation is below standard
- Other dashboard data that provide leading indicators such as learning gains, number of minutes in school year dedicated to instruction, minutes of extended learning time a year, student attendance rate, discipline incidents and truancy

These annual monitoring indicators will help inform the school, district, and SEA of the progress of the school and provide objective measures for use in modifying the action plan if necessary.

After three academic years, , a focus school identified on the basis of graduation rate may exit focus status if 1)) it achieves the higher of an absolute graduation rate above 60% or an improvement in the graduation that is one half of the difference between baseline graduation rate and 100% AND 2) meets its proficiency AMOs (including participation rates). Schools identified on the basis of gap scores, must close achievement gaps to the extent that it no longer resides in the bottom 10% and close gaps by at least 50% from their former levels.

These exit criteria were chosen based on the following:

- They provide enough time for interventions to take hold and become part of the school culture.
- They indicate that the school is performing at a level on par with rigorous expectations.
- They meet any other applicable federal guidelines for other grant programs.

Schools that do not exit at the end of their three year cycle will continue as focus schools and need to implement further interventions with the oversight of the external evaluator. This process will ensure that the school is supported until it has achieved the appropriate level of success in assisting students to become college and career ready.

Schools that Fail to Improve after 3 Years of Full Implementation of Interventions

Schools that fail to improve academic achievement after full implementation of interventions will be considered for additional measures to safeguard students' right to quality public education. The first step in this process will be to examine the degree to which the planned interventions were implemented. This process will mirror the process described for priority schools that fail to make progress. Again, similar to the process outlined for priority schools, PRDE's Central level staff will

work with the schools to develop a new/revised improvement/action plan. The new plan will be based on current understanding of patterns of student achievement as well as the lessons learned from the initial implementation.

In addition, PRDE may consider the benefits of reassigning staff at these schools. *Reglamento No 6743 del Personal Docente del DEPR*, as amended by *Reglamento 7292* and *Reglamento 8037*, establishes the procedures for relocating PRDE personnel. *Reglamento No. 7565 de Medidas Correctivas y Acciones Disciplinarias* regulates disciplinary actions that PRDE can take against personnel that are not fulfilling their duties guaranteeing due process. Ultimately, Law No. 149 *Ley Orgánica del Departamento de Educación de Puerto Rico del 15 de Julio de 1999* as amended, assigns responsibility for the closing of schools to the Secretary of Education.

2.F PROVIDE INCENTIVES AND SUPPORTS FOR OTHER TITLE I SCHOOLS

- 2.F Describe how the SEA's differentiated recognition, accountability, and support system will provide incentives and supports to ensure continuous improvement in other Title I schools that, based on the SEA's new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps, and an explanation of how these incentives and supports are likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

Encouragement and Support Systems

The Office of the Undersecretary of Academic Affairs has chosen to include all schools in its accountability system regardless of Title I status. PRDE feel that it is part of our responsibility to ensure that all schools on the island are effective at assisting students in becoming college and career ready. As such, the supports in this section apply to all schools, including the 18 non-Title I schools.

PRDE has created several layers of encouragement for the remaining non-categorized Title I schools that are not priority, focus or rewards schools and are working to make progress to strengthen their functioning and assist students in improving their performance. The first layer is supporting professionalism. PRDE recognizes that all school staff are generally committed to the education of children and the improvement of their practice and relish the opportunity to improve the effectiveness of their instruction and contribute to increased student outcomes. PRDE's proposed differentiated accountability system attempts to recognize educators for the effort they make each day for their students and marks a shift away from the historically putative approach that had been used. A second layer of encouragement is the opportunity to be named a reward school. The reward school recognition is an opportunity that is open to all schools either in the area of performance or growth. PRDE made the decision to base these identifications on a single year so that more schools have the opportunity to be a reward school faster than if multiple years were required for identification, making the goal of being named more achievable to all schools.

The third layer is transparency and visibility. While school status is no longer annually determined by AYP attainment, reporting will continue to be a vital part of PRDE transformation strategies. Public reporting of school performance enables parents and the community to hold schools accountable for

student and school outcomes. Public accountability challenges schools to demonstrate they are meeting expectations and to nurture healthy relationships with their community. PRDE will continue to report subgroup performance against the new AMOs for all schools and graduation rate for high schools. Included in this reporting will be participation rate by subgroup and other academic indicator such as attendance.

The fourth layer focuses attention on college readiness. As part of PRDE's commitment to promote college participation for all students including SWDs and LSP students, the Office of the Undersecretary of Academic Affairs will annually publish both the college going and college credit accumulation rates for each identified subgroup that has at least 30 students (in keeping with PR's current approved subgroup size) in each high school in Puerto Rico. This reporting will become effective as the new Statewide Longitudinal Data System comes on-line and we are able to expand its functionality to collect post-secondary data.

The fifth layer is public reporting of the outcomes of school improvement efforts. Schools that miss AMO's for two consecutive years and high schools that do not meet graduation targets for two consecutive years will be required to demonstrate that the interventions selected in their action plan for continuous improvement align with and have milestones to monitor the needs of the students in the categories that have missed the targets. This reporting will be facilitated by monitoring that takes place within each district with oversight by the Office of the Undersecretary of Academic Affairs.

Support to the Remaining Non-Categorized Title I Schools

PRDE will provide additional support to a subset of the remaining non-categorized schools. The lowest achieving 5% of the Title I schools will receive customized support from the external evaluator. The measure used to determine this will be: the difference in proficiency (i.e., the percent of students scoring Proficient or Advanced) over two years. For grades 3-8 the proficiency measure includes SLA, Math, and English for both the general assessment and the PPEA. For grade 11 it includes SLA and math for the general assessment and PPEA.

This support is intended to ensure that their action plans for continuous improvement address the needs that have been identified by the FLICC needs assessment. In addition, to further support the 5% of these schools with the greatest need, the Office of the Undersecretary of Academic Affairs will reach out to community leaders, including those from local foundations, businesses, universities, and other sectors of the community at-large, to work with these schools (as suggested by stakeholders during the 2012 community forums).

The majority of support for the remaining non-categorized Title I schools will come from regional and district personnel. Presently, all schools are required to develop and implement an action plan for continuous improvement. As has been indicated, this action plan is an extension of the Comprehensive School Plan (CSP) which is reviewed and approved annually by the district that oversees the school. As is true for all PRDE schools, the CSP and related action plan developed by the remaining non-categorized Title I schools is based on the goals, objectives and scientifically based instructional strategies and interventions that guide the preparation of the PCE set by the Office of the Undersecretary of Academic Affairs. The goals and objectives of the PCE are aligned with the 7 turnaround principles.

The process for developing the CSP is presented in PRDE's response to Principle 1. Additional detail is provided here to provide increased visibility into the process that the remaining non-categorized Title I schools will complete. CSP are developed locally by each school director with his/her School Planning

Committee. In order to prepare a CSP, the team has to identify the internal and external factors affecting the school and preventing it from achieving its goals. Through the school needs assessment, the director and the Planning Committee identify the school's strengths and weaknesses and establish priorities for improving student achievement. After this analysis, the team then selects from an approved list of goals, objectives and activities those that attend their specific needs and characteristics. Each school's CSP is then reviewed and approved by the district academic facilitators, the Auxiliary District Superintendent of Technical Assistant and the OFA Title I coordinator.

The PCE strategy will continue but the methodology will be improved by requiring each school to annually complete a self-assessment of school needs. The self-assessment will be completed using the tool developed by FLICC. The FLICC self-assessment collects perception data based on classroom observations and surveys of school directors, school administrators, teachers, and students. Schools will be assisted in this process by the academic facilitators in the district offices. After schools complete the self-assessment, they will summarize the findings and determine the root causes that require intervention. The FLICC self-assessment contains the following components (see

Exhibit 16).

Exhibit 16. FLICC Needs Assessment Indicators

Perception Data	<ul style="list-style-type: none"> • Alignment of instruction, planning, and materials with Puerto Rico's standards and expectations • Effective teaching strategies • Formative and summative assessments • The use of achievement data • School climate • Parent involvement • Student engagement • School leadership • The needs of special populations (LSP students and students with disabilities) • Teacher evaluations, feedback loops, and professional development • Use of financial and other resources (materials, technology, libraries, etc.)
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The results of this self-assessment, along with an assessment of schools' performance against proficiency targets, graduation targets will be used as the basis for the action plan for continuous improvement. Action plans address both proficiency-based and graduation rate-based interventions to target those subgroups that miss targets. District academic facilitators will ensure that the remaining non-categorized Title I schools pay particular attention to the performance and needs of LSP and SWD subgroups. The CSP and action plans will be reviewed by the district academic facilitators who will have been trained on the use of the needs assessment. The review will ensure schools' action plans demonstrate alignment between strategies and the needs assessment. It should be noted that all of the best practices discussed under the priority schools and focus schools can be applied to the remaining non-categorized Title I schools. Should misalignments be determined, schools will be required to revise

their plans and the academic facilitator will be required to participate in more development so that they can directly identify misalignment before approving a plan. In addition, annual assessments of progress will be made using the indicators listed below:

- number of AMO and (for high schools) graduation rate targets met and which targets are met compared with previous years
- changes in proficiency rates across the school by subject
- changes in the percent of students making or exceeding their growth target
- gaps in the percent of students meeting or exceeding their growth targets by subgroup
- trends of student performance as broken down by teacher (as detailed in principle 3)
- trends in teacher evaluation results and supports implemented for teachers whose evaluation is below standard

As explained previously, PRDE intends to use the same success criteria for priority, focus and the remaining non-categorized Title I schools. PRDE selected this approach to ensure uniformity in the application of its differentiated accountability system, streamline the process of performance monitoring, and make optimal use of existing human resources and procedures. In addition, the selected outcome criteria are expected to be valid indicators of students' college and career readiness (see full discussion of University of Puerto Rico's assessment for PRDE's standards presented under Principle 1 for more information).

Among the remaining non-categorized title I schools, those schools that do not 1) meet AMOs, 2) meet graduation rates (for high schools), and 3) make progress on these indicators will need to modify their action plans for continuous improvement to address the areas of concern. This means that PRDE will require schools that miss AMOs or graduation rate targets in a given year to modify their school improvement plans to include actions that will address the missed targets. These interventions will begin in 2013-2014 based on performance data from [school year(s) 2011-2012 and 2012-2013]. The modified plans will be reviewed and approved by both District level staff and then undergo a two-part review by the Office of Federal Affairs and the Office of the Undersecretary of Academic Affairs. District level academic facilitators will be responsible for assisting these schools in 1) making more appropriate choices of interventions and/or 2) assisting with and coordinating the implementation of planned interventions. As has been indicated, the external evaluator will provide oversight of the interventions to the 5% of schools within the remaining non-categorized Title I schools. The external evaluator's oversight and support will focus on the fidelity of implementation and an assessment of the appropriateness of approved interventions.

All non-priority, non-focus schools will summarize the results of their needs assessment, identify priority areas, and select the strategies most likely to enable them to address these prioritized need(s). The following strategies have been developed by PRDE and will be considered by all non-priority, non-focus schools as they develop their CSP and action plans.

- Coordinate with district level staff to develop a professional development plan that is designed to build the capacity of the school staff and is informed by student achievement

and outcome-related measures. The school level professional development plan will take into consideration the various needs of the instructional staff, be systemic in behavior-changing approaches that foster collaboration and increase teacher knowledge of best practices. The school level professional development plan must: 1) include instructional teams that meet regularly to examine student work, collaborate on lesson design, and implement instruction based on proven effective strategies and 2) provide time for all staff to collaborate and plan strategy implementation.

- Target research-based strategies known to change instructional practice and address the academic achievement challenges that led to the school not making the AMOs.
- Include innovative and/or customized professional development opportunities such as data retreats and creating professional learning communities
- Identify the expected outcomes for students
- Specify the self-monitoring strategies that will be used with individually targeted students and/or subgroups. Develop new methods for supporting specific students and/or subgroups of students using progress-monitoring instruments, data analysis, collaborative decision-making,
- Explore the use of tools that facilitate delivery of the curriculum including curriculum maps or other tools that align with the PRDE Curriculum. Conduct a curriculum gap analysis and use this analysis to create new strategies and resources that improve the delivery of PRDE's curriculum, increase all students' access to the standards-aligned core curriculum and facilitate use of tiered and/or differentiated instruction
- Create partnerships among external entities to obtain technical assistance, professional development, and management advice. These efforts could include using partnerships that make it possible for schools leverage additional assistance necessary to meet its unique needs
- Strengthen the parental involvement component of the CSP and related action plan by and working with external providers and other technical experts to increase opportunities for parents to become more involved in the educational process.

In addition to these strategies, schools may implement other strategies determined by the school, in consultation with district, regional and Central level staff. Appropriate strategies will be those for which data indicate the strategy is likely to result in improved teaching and learning. In all instances, schools will be required to plan for collecting, analyzing, and interpreting individualized student data in order to adjust the daily instruction to promote student outcomes.

Use of School Improvement Funds

Similar to Maryland's approach, PRDE is seeking an additional waiver that is not already included in ESEA

flexibility, to use 1003(a) School Improvement funds to help Title I schools that are not Focus or Priority schools. After first providing 1003(a) funds to focus schools, PRDE seeks to make 1003(a) funding available to the Title I schools within the remaining non-categorized Title I schools. While Focus schools will receive 1003(a) funds automatically, non-focus schools will have to apply for additional funding. Failure to make this funding available to this group of schools would be detrimental because these schools would lose access to previously available funding. Such a loss of funding would compromise school improvement efforts in these schools.

1003(a) funds will be restricted to supporting improvements and interventions that address teaching and learning practices. These improvements and interventions must be aligned with the causes that resulted in the school not meeting AMOs and/or graduation targets in any subgroup. Title I schools that are not reward schools but need additional interventions to 1) improve students achievement and 2) in case of high schools, meet graduation targets for all students or subgroup of students.

Consistently failing to improve achievement for all students and subgroup of students will be determined based on PPAA and PPEA results. PRDE expects that non-priority, non-focus schools with the following achievement profiles would be good candidates to apply for 1003a funds:

- graduation rate less than 60%
- all or nearly all subgroups fail to make progress in meeting state standards for more than 2 years
- failure of a particular subgroup to make progress in meeting state standards for more than 2 years
- lack of funds in school budget to fund planned interventions that have demonstrated effectiveness in improving performance in the last 2 years
- demonstrated issues related to attendance and climate that create conditions in which effective teaching and learning cannot take place
- Comprehensive School Plan needs assessment indicates that the school has significant and pervasive challenges and are unlikely to be able to demonstrate progress if a systemic approach is not adopted.

PRDE will prioritize applications for 1003a funds using the following business rules:

- applicants will be rank ordered based Proficiency rates PPAA and PPEA scores in Spanish and Math
- priority will be given to applicants that meet three or more of the eligibility indicators listed above
- applications for 1003a funds will align with and/or extend and/or enhanced strategies

already listed in the school's CSP and action plans

If multiple schools meet the criteria and PRDE has insufficient funding to approve all applications, decisions to approve funding will be based on the quality of the school's application for 1003 (a) funds. The application for 1003 (a) funds must: 1) incorporate the findings from the needs assessment used in the Comprehensive School Plan; 2) support or advance the implementation of the school's action plan and 3) include a clear explanation of the strategies identified for each stated need. It should be noted that strategies funded by 1003(a) funds must be in addition to, compliment, enhance or otherwise extend the support services already being provided by the PRDE through its system-wide training and professional development efforts that have been described throughout this Flexibility Waiver request.

After 1003(a) funds have been distributed automatically to focus schools, the remaining 1003(a) funds will be allocated to support non focus schools that meet the criteria outlined above. Non focus schools will have to apply in order to receive 1003(a) funding.

The process of applying for and awarding 1003 (a) funds will be done using PRDE's existing infrastructure, policies and procedures that have historically governed this activity. PRDE expects to be able to fund a significant number of non-priority non-focus schools.

1003(a) funds will be used to provide technical assistance related to implementing teaching and learning practices that are expected to increase the likelihood of students in these schools meeting the AMOs and/or graduation targets. Interventions supported with 1003(a) funds will also include those strategies that have been effective in reducing large gaps in achievement and are consistent with schools' improvement plans.

Technical assistance related to teaching and learning could include, but is not limited to:

- Guided practice and training in analyzing data from assessments and other examples of student work to inform the selection of instructional practices
- Consultation to identify and address ineffective with instructional practices and develop more effective practices
- Assistance in identifying and addressing problems implementing parental involvement activities and developing more effective parent engagement initiatives
- Assistance identifying and addressing problems implementing the school's CSP and action plan.
- Assistance identifying and implementing professional development, instructional strategies, and methods of instruction that are based on scientifically-based research and that have proven effective in addressing the specific instructional issues, both content and subgroup specific

In addition, PRDE will make technical assistance available to schools receiving 1003(a) funds through

School Support Teams. This technical assistance will be provided upon request. School Support Teams' responsibilities include:

- Reviewing and analyze all facets of the school's operation, including the design and operation of the instructional program
- Assisting the school in developing recommendations for improving student performance in the school
- Assisting the school in its efforts to collaborate with parents and school staff to design and implement an action plan that can reasonably be expected to improve student performance and help the school meet its goals for improvement
- Making additional recommendations as the school implements that plan
- Providing assistance in analyzing and revising the school's budget so that the school's resources are more effectively allocated to the activities most likely to increase student academic achievement and remove the school from school improvement status

The Office of Federal Affairs will provide additional technical support and oversight of the fiscal and programmatic aspects of school improvement initiatives funded with 1003 (a) funds. Schools will be randomly selected to receive monitoring during each school year. At any time after the 1003(a) funds are awarded, schools can request assistance related to federal compliance and grants administration from district level staff that support Title I and/or the Office of Federal Affairs.

At the end of the school year, PRDE will require each school that received 1003 (a) funds to submit an evaluation of the effectiveness of their 1003 (a) interventions. These evaluations will be reviewed at the central level and used as part of the deliberative process for reviewing 1003 (a) applications in future school years.

Monitoring School Performance

As has been indicated, the remaining non-categorized Title I schools will be supported by district academic facilitators. This support involves assistance with conducting a needs assessment (as requested) and assistance developing the CSP and related action plan, and ongoing support and assistance throughout implementation of planned activities. Data on implementation and outcomes will be made available through the PRDE dashboard. District level staff, as well as staff from the Office of Federal Affairs, will conduct monitoring and oversight visits to these schools throughout the year. The visits by these offices will focus on fidelity of implementation and compliance with federal requirements, respectively. In addition, as has been described in detail previously, the external evaluator will provide support and oversight to the 5% lowest achieving of the remaining non-categorized Title I schools. The efforts to provide additional support to these schools at risk of becoming focus schools could be supported with either 1003(a) funds or with 1116(b)10 funding SES/Choice.

Schools will conduct monthly assessments of their progress implementing planned assessments. As has been indicated, this data will be collected and published using the PRDE dashboard. In addition, the remaining non-categorized Title I schools will receive annual assessments of progress. The annual

assessments have been detailed in this section and include progress on a defined set of indicators from the needs assessment as well as the uniform annual performance expectations PRDE has set for all schools. The ongoing nature of the review of schools progress will allow PRDE to identify and respond to schools emergent needs for customized support and/or technical assistance. In addition, non-priority, non-focus schools that receive 1003(a) funds will be required to complete an annual evaluation of funded activities.

2.G BUILD SEA, LEA, AND SCHOOL CAPACITY TO IMPROVE STUDENT LEARNING

- 2.G Describe the SEA’s process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, including through:
- i. timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools;
 - ii. ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools identified under the SEA’s differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources); and
 - iii. holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools.

Explain how this process is likely to succeed in improving SEA, LEA, and school capacity.

Timely and Comprehensive Monitoring and Technical Assistance

The PRDE has an extensive support system in place for overseeing, monitoring, and providing technical assistance to Puerto Rico’s Title I schools. Unlike most mainland States, the PRDE’s structure – with staff at the central, regional, and district levels – facilitates our ability to reach every one of our 1,457 schools by making staff from various levels responsible for provide a variety of services and functions at the school level. PRDE recognize the benefits of our structure and intend to capitalize on it in order to support our schools and staff.

In order to ensure that the interventions are sustained and result in systemic change in priority schools, significant school improvement planning and monitoring occurs at the SEA level and monitoring occurs at the district level. Monitoring and technical assistance activities for all priority schools are outlined in Exhibit 17 below.

Office of the Undersecretary of Academic Affairs

The Office of the Undersecretary of Academic Affairs and the Office of Federal Affairs will each play a significant role in supervising and managing the implementation of the differentiated accountability system. Many of the specific roles and responsibilities for these offices, with respect to technical assistance and oversight, have been detailed in the previous sections within Principle 2. PRDE is confident its infrastructure and established practices will enable it to better support all schools as they assisting students, especially students with disabilities and LSP students in becoming college and career ready.

The Office of the Undersecretary of Academic Affairs has primary responsibility for managing all programmatic aspects of this ESEA flexibility request, including implementation of interventions to improve teaching and learning. The Office of the Undersecretary of Academic Affairs works in close-collaboration with the Associate Secretary for Special Education and the LSP Program director. These three offices lead PRDE's efforts to improve student academic achievement and ensure effective instruction and leadership in every school island-wide. As The Office of Federal Affairs is responsible for overseeing compliance with federal requirements and ensuring the use of federal funds extends and enhances PRDE's primary academic program.

The Office of the Undersecretary of Academic Affairs receives and analyzes student and school academic achievement data and uses this information to direct the work of the following offices:

- Academic Programs Directors
- ICAAE
- InDePM
- Auxiliary Secretary of Academic Services and Community Education Services
- Auxiliary Secretary of Student Assistance Services
- Auxiliary Secretary of Occupational and Technical Education and
- Schools Districts

The development of all schools CSP and improvement plans or action plans are ultimately guided the Office of the Undersecretary of Academic Affairs. The Office of Academic Affairs defines and/or approves the framework and/or components used in the CSP, school improvement plans and action plans.

Ultimately, the review and approval of all school level plans is the responsibility of the Office the Undersecretary of Academic Affairs. As has been detailed throughout PRDE's response to Principle 2, the different offices accountable to the Office of Academic Affairs (listed above) have specific roles and responsibilities related to the development, review, approval and implementation of school level plans. These roles and responsibilities have been detailed for priority, focus, reward and the remaining non-categorized Title I schools. All staff that report to the Office of Academic Affairs have received training and are aware that schools' CSP and improvement plans or action plans must 1) use AMOs, graduation

rates and other measures to inform the interventions and 2) provide incentives and supports most likely to help teachers meet students' needs.

The Office of the Undersecretary of Academic Affairs uses existing administrative and management processes (i.e., meetings, monthly reports) to keep track of the work completed by these offices, including the degree to which staff in these offices have assisted schools with their CSPs and school improvement or action plans. In addition, the Office of Academic Affairs will use the two available dashboards and require monthly electronic progress reports to ensure that schools are receiving sufficient support in the development and implementation of their plans. It should be noted that, in addition to the Central and regional level supports discussed above, academic facilitators at the district level are accountable to the Office of Academic Affairs and responsible for supporting schools in the development and implementation of CSP and improvement and/or action plans.

In addition, the Office of the Undersecretary of Academic Affairs, and its associated staff, is responsible for providing implementation support services to reward schools, focus schools, and the 5% lowest achieving schools of the remaining non-categorized Title I schools.

Office of School Improvement

The Office of School Improvement (OSI) is currently an unit within the Office of Federal Affairs and oversees and monitors Puerto Rico's School Improvement Grant (SIG) schools. Because the 50 currently identified SIG schools will be identified as priority schools under this new differentiated accountability system, OSI will oversee, monitor, and provide support to all 100 priority schools in the 2013-2014 school year. OSI's support is intended to ensure schools implement interventions to improve school instructional effectiveness and student performance through whole school change. As part of their support to priority schools, OSI will also visit school districts at least twice during the school year and provide support as needed. In addition, the authority and responsibility for monitoring the implementation of the interventions of priority schools rests with the SEA in the Office of School Improvement

In order to support the 20 non-SIG schools, the OSI will provide services similar to the services that are being provided to 50 SIG schools. This is appropriate because the non SIG schools will be asked to implement interventions that are similar to those being implemented in SIG schools. As such, the non SIG schools will implement interventions that are consistent with the turnaround principles as indicated on pages 92-98. Examples of these types of support include ensuring that non-SIG priority schools: review the performance of the school director and replaces the school director if such a change is necessary to ensure strong and effective leadership; participate in the Transformational Leadership Director's Academy; provide oversight to ensure that district and school provide evidence of a collaborative review of school and district practices and procedures and recommendations of ways to provide increased flexibly if necessary; ensure schools create Individual Professional Development Plans for teachers of targeted subgroups and validate that the needs of specific subgroups are consistent with the professional development outlined in schools CSP and school improvement plans; through collaboration and oversight ensure schools have appropriate resources to redesign the master schedule to allow for professional development opportunities that could take place during common planning

time, data driven decision making sessions, and job-embedded professional development. OSI will also ensure that the monitoring and oversight described for SIG schools is provided.

All priority schools are to be monitored annually through on-site and desktop reviews beginning with the 2010-2011 monitoring cycle. To effectively monitor the schools, the SEA created monitoring instruments and trained the SEA Compliance Oversight Unit responsible for monitoring SEA compliance, the Office of Federal Affairs (OFA) Monitoring Unit responsible for supervising and coordinating the Regional Monitoring Units' (RMU) calendars and the Regional Monitoring Units responsible for monitoring the schools. Recurring issues in schools identified by OFA's Monitoring, Regional Monitoring and Dissemination and Technical Assistance Units are addressed in order to support remediation. Roundtable Committees comprised of SEA representatives and Regional and District staff meet monthly to coordinate monitoring activities and identify appropriate support needed to enable schools to realize school improvement goals.

The Office of School Improvement is responsible for ensuring that external providers that assist in implementing the intervention models selected through the state's competitive RFP process are successfully implementing the selected intervention model. Under our current SIG school model, each of our cohort I SIG schools partners with its own provider. There are a limited number of cases where the same provider works with two SIG schools. Evaluation of external providers is ongoing, and includes comparisons of student achievement and growth data (including within subgroups) and student and teacher surveys over time, in order to determine providers' effectiveness. External auditors are also under contract to verify that external providers receiving SIG funds are complying with their contractual agreements and are aligning services to school needs.

Other Central Level Offices

The Office of the Auxiliary Secretary for Planning and Educational Development analyzes data and is helping to develop the PRDE dashboard which will make data and analysis results readily available to focus schools, reward schools, and the remaining non-categorized schools. The collection and dissemination of this data is a critical component of PRDE's oversight and monitoring strategy.

Office of Federal Affairs

The Office of Federal Affairs (OFA) has substantial capacity to support this differentiated accountability system. This office has and will continue to provide compliance monitoring and technical assistance in alignment with federal regulations and rules as required by the USDE and standard accounting practices. The staff is experienced with federal programs and knowledgeable about the requirements of ESEA Flexibility. OFA staff at all levels will provide technical assistance to ensure PRDE schools are meeting all federal requirements.

District, Regional and School Level

The School Districts' Responsibilities Include providing leadership to focus on student learning and achievement, supporting and training teachers, guiding implementation of curriculum, instruction and assessment, using information for planning and accountability and engaging families and the community. The School Districts' Superintendents, Assistant Superintendents, Academic Facilitators and Special Education Academic Facilitators are responsible for providing support and technical assistance to school staff in all aspects of teaching. Specific responsibilities related to oversight and monitoring are outlined

below.

- School Superintendents
 - Prepare an intervention plan and a timetable for needs assessment, technical assistance and monitoring visits to be conducted by Academic Facilitators and Special Education Academic Facilitators for each subject matter.
 - Evaluate the academic strategies that schools selected
 - Oversee implementation of school-based strategies to support new school directors and teachers.
 - Monitor the implementation of the PCE and school organization plan to ensure that the needs identified are met
- District staff (i.e., Academic Facilitators)
 - Oversee schools' implementation of CSPs and related action plans and assess compliance with the submitted plan
 - Identify emerging needs for support and technical assistance
 - Submit monthly progress reports to schools and the Undersecretary of Academic Affairs.
 - Provide support and technical assistance to teachers for each subject matter in the content and use of academic standards in the daily planning, teaching strategies and assessment of student learning.
 - Visit teachers to meet the needs identified by school directors through surveys and exploratory visits
 - Develop specific support to assist educators in analyzing and implementing appropriate learning strategies and necessary accommodations to ensure that students with disabilities and LSP students receive the support they need to achieve their potential.
 - Identify teachers of students with LSP and disabilities to offer support and technical assistance in the adaptation and modification of the curriculum materials to the students' needs.
- Regional Monitoring Units
 - Monitor schools to determine compliance with academic progress and state and federal fiscal responsibilities.
 - Require districts that cannot provide evidence of schools' progress to submit a corrective action plan outlining the strategies and activities to be carried out to provide

additional support to schools

Schools

- Create a Planning Committee to conduct the needs assessment and determine the variables responsible for low achievement
- identify areas to be addressed and select strategies to improve academic achievement and use this information to develop the PCS and related school improvement or action plan
- Submit a progress report (*Informe de Logros*) once per semester to the School District describing those aspects of the school's plan that have been implemented, progress made by students during the first 20 weeks of the semester and the school's projections

External Evaluator

PRDE will engage an external evaluator that has national stature and a history of serving on USDE peer reviews and working with various state educational agencies. The external evaluator holds a doctoral degree and has a track record of success providing evaluation services for State education agencies. This external evaluator will be responsible for collecting data and assessing the implementation and effectiveness of PRDE's proposed differentiated accountability system. The external evaluator is responsible for ensuring that, in priority, focus and 5% of the schools identified within the remaining non-categorized Title I schools proposed interventions are 1) aligned to school needs, 2) implemented with fidelity, and 3) having a positive impact on student achievement. The external evaluator will also be responsible for (provide guidance related to the type of interventions schools should select and most effective means that PRDE staff at the Central, regional and district levels can support efforts to improve teaching and learning.

In order to coordinate and provide oversight to the external evaluators, PRDE will require each evaluator to submit a monthly report. These monthly reports will be submitted to the Office of Federal Affairs and disseminated to OFA staff based on their existing regional/district level assignments. The OFA staff will review the submitted report and compare it to the planned service provision outlined in the respective schools' CSP and action plans. Any deviation from the planned delivery of service will be noted and forwarded to the monitoring staff who will follow up on the observed deviation during regular monitoring visits. In addition, a mid-year report of deviations in planned service delivery will be created and forwarded to both the Office of Academic Affairs and the Quality Assurance Unit (discussed on page 128). The mitigation and corrective action responses described under the Quality Assurance Unit roles and responsibilities and general contract management sections also apply to the contract with the external evaluator. Significant deviations will be addressed immediately and the performance of all external evaluators will be reviewed at the end of the academic year.

In addition to all of the Flexibility specific oversight described above, PRDE will continue to engage in the regular practices of monitoring schools and districts that has been implemented in previous years.

Focus schools will be supported by the Office of the Undersecretary of Academic Affairs and the external evaluator. This support will include assistance in completing the FLICC needs assessment, identifying interventions, coordinating the implementation of these interventions, and ensuring that the interventions are applied and having a positive impact on student achievement.

The remaining non-categorized Title I schools will be supported by the districts, which fall under the Office of the Undersecretary of Academic Affairs. They will assist these schools in completing the FLICC needs assessment and identifying interventions to address school's needs. In addition, these staff will ensure that schools that miss AMOs for two consecutive years will implement more rigorous interventions to address the school's needs. This process will be overseen by the external evaluator to ensure it is not only being implemented but also that it is having an impact on student performance. The lowest 5% of these schools will be supported by the external evaluator.

Review, Approval and Oversight of External Providers

Schools that need additional support to implement their school improvement plans select external providers from the PRDE's list of pre-approved providers to offer services. To develop the list of pre-approved providers, PRDE releases a Request for Qualifications (RFQ) and conducts an orientation for potential providers. Interested providers submit proposals to the Office of School Improvement (OSI). OSI trains both internal and external reviewers on proposal evaluation. Based on the review process, providers are selected and identified for inclusion on the PRDE list of pre-approved providers.

PRDE's criteria for evaluating external providers were developed based on the *Guide to Working with External Providers* (Learning Point, 2010). PRDE used this Guide to create a framework for engaging, managing and evaluating external providers. PRDE expects that the majority of service providers will be non-profit and/or professional organizations, private providers, and/or colleges/universities. Providers from these groups can be evaluated using the following criteria:

- Providers' understanding of PRDE's needs and capacity to align products and services with these needs
- Providers' demonstrated success realizing positive impacts on teaching and learning
- Degree to which providers' professional development activities are research based and aligned with PRDE's established academic, curricular and instructional goals
- Degree to which provider's products and services can be customized
- Provider ability to demonstrate how professional development activities are part of a long-term, overarching strategy for improving teaching and learning
- Provider ability to focus on the specific content that teachers need to teach and students need to learn
- Provider ability to link research-based instructional strategies that address the specific challenges that have been identified by schools in their needs assessment and other school improvement planning documents
- Degree to which the providers' services align with other major initiatives currently underway in PRDE and degree to which providers' services support services currently being provided by PRDE staff

The timeline for provider evaluations is continuous. An evaluation plan for each provider will be created before work commences. PRDE's process for evaluating external providers will differentiate service delivery from outcomes. The goal of this evaluation system is to promote continuous improvement and allow for internal capacity building related to vendor selection and oversight. The evaluation of the provider will be aligned with PRDE's larger system of accountability (i.e., PPAA results, graduation rates) but also include intermediate measures of progress. These intermediate indicators will assess the degree to which 1) requested/desired services were provided and 2) annual achievement goals are being met.

Additional methods of evaluating providers' performance include ongoing communication about the delivery of services that takes place throughout the service delivery period. These ongoing communications can include evaluations of training sessions (upon completion), regular debriefings between school leaders and providers and time for discussion of provider services during staff meetings.

PRDE is in the process of customizing the templates provided in the Guide to create a checklist that can be integrated to the current protocol to evaluate providers' proposals. Draft questions for this checklist include:

- explain how your services align with PRDE's defined needs
- explain how your services support PRDE's long term strategy to improve teaching and learning
- explain how your services can be customized
- explain how you used research and best practices to develop your services
- explain your service delivery model and explain your implementation strategy
- explain how you will evaluate the outcomes of your service using both formative and summative measures
- explain how your services are expected to result in improved teaching and learning as reported on the PPAA
- explain how you will provide periodic updates on the delivery of services and the outcomes being realized

To evaluate the providers' services after the period of performance, PRDE will issue an online survey to staff in schools where external providers worked. Draft questions include:

- Were there any problems during implementation?
- Did the provider establish and maintain a good relationship with the school and district?
- Did the provider deliver the services as expected?

- Were there any gaps between the school's needs and the providers' services?
- Were there any logistical challenges? If yes, were they resolved quickly and efficiently?
- Did the providers' service align with PRDE's contents standards and assessment practices?
- Did the providers' services conflict with any local requirements?
- Did the provider engage in ongoing, open communication with all relevant stakeholders?
- Did the provider respond to expressed concerns/issues in a timely and efficient way?

PRDE has outlined the actions it will take when providers do not meet the criteria or follow Puerto Rico's policies and procedures instances where the provision of services is determined to be unacceptable. First, PRDE will create a Contracts Quality Assurance Unit. This unit will be the central point of contact that PRDE staff should reach out to as soon as issues related to the quality or compliance of providers' services becomes a concern. The staff in this unit serves as a liaison between the Office of Federal Affairs, PRDE schools and external providers.

Second, PRDE's contracts outline the course of action, from a contractual point of view, that will take place if providers' do not meet the criteria or follow Puerto Rico's policies and procedures instances where the provision of services is determined to be unacceptable. PRDE's contracts contain the following provisions:

- The SECOND PART agrees to defend, support and represent the findings, evaluation and analyses of the written materials, including reports, drafts from studies and projections carried out by the SECOND PART in compliance with the provisions of this Contract at any forum which requests the SECOND PART's appearance.
- The SECOND PART shall not subcontract the performance of the services specified in paragraph number "3" of this Agreement. The SECOND PART will be responsible for hiring the personnel that will offer the services under this Agreement. The FIRST PART shall have no obligation regarding the working schedule, wages and any other claim on the part of the personnel recruited by the SECOND PART under this Agreement.
- The SECOND PART assures that the services shall be rendered in good manner and professionally. If the SECOND PART fails to render the services in such manner, the FIRST PART will be entitled to contract other persons for the rendering of said services, and the SECOND PART shall pay to the FIRST PART any cost or expense incurred and attributable to such services if the fees of the SECOND PART have been paid or for the amount in excess of the fees under this Agreement for said services if the fees have not been paid by the FIRST PART
- In all pertinent and the applicable, the SECOND PART is specifically committed to the transference of knowledge to the personnel of the FIRST PART during the term of the

present contract, which is an essential and obligatory condition to its fulfillment. The violation of this disposition will be sufficient cause for the FIRST PART to conclude this obligation and the SECOND PART will have to refund to the FIRST PART all sum of money received under this Contract.

Third, PRDE will ensure that payments are made during the course of services. This will enable PRDE to assess progress of the services as they are delivered.

Finally, the following issues are considered to be material and have been identified as potential grounds for early termination: 1) failure of the school to achieve anticipated results over time, 2) chronic unsatisfactory ratings of providers' services in evaluations, and/or 3) a change in policy or law that makes the providers' services impossible. Decisions related to the continuation or renewal of a contract will be based on the degree to which promised outcomes were delivered.

Priority Schools: Oversight, Monitoring and Technical Assistance

Exhibit 17. Monitoring Activities for All Priority Schools at the School Site

LEVEL	UNIT RESPONSIBLE	TYPE OF ACTIVITY	FREQUENCY	REPORTING CONTACT
Central	Office of Federal Affairs (OFA) Compliance Oversight Unit	Compliance	Annual or in as need basis	Office of School Improvement
Central	OFA Dissemination and Technical Assistance Unit	Dissemination and Technical Assistance by Technical Assistance personnel in Districts	Ongoing	Dissemination and Technical Assistance Unit and District Superintendents
Central	Office of School Improvement through SIG DASHBOARD system	Data Collection	Bi-monthly	Office of School Improvement
Regional	School Improvement Specialist	Implementation (Timeline)	Ongoing	Office of School Improvement
District	District School Support Teams Office of School Improvement	Program (School Site Reviews)	Annual	Office of School Improvement District and Region School Improvement Specialist
District	District School Support Teams	School Visits Review of	Ongoing	School Director & Office of School

		Implementation of SIG model		Improvement School Improvement Specialist
School	School Director	Classroom Observations	Ongoing	
	Coaches	Teacher Evaluation	Annually	Office of School Improvement
	Subjects Matter Academic Facilitators	Tracking Performance Data	Ongoing	

Ensuring Sufficient Support to the Entire PRDE System

In addition to all of the Flexibility specific oversight described above, PRDE will continue to engage in the regular practices of supporting schools and districts that has been implemented in previous years. These efforts include new work that is scheduled to be executed as PRDE implements its differentiated accountability system.

PRDE's primary means of improving student achievement and school improvement is the implementation of its curriculum. This approach is based in decades of research demonstrating that a content-based focus is the only effective means by which achievement can be improved. Our partners in developing our professional development plan and implementing this plan through at least the 2013-2014 school year, are required to transfer knowledge and skills that allow Puerto Rico's educators to run the professional development process in years subsequent to 2016-2017, preceded by a gradual scaffolding of reduced supports.

PRDE's implementation of its curriculum is supported by a 1) complete set of pacing guides or curriculum maps, and sample instructional strategies aligned with state standards and/or grade level expectations, 2) LSP standards for students with limited or no Spanish language knowledge, experience, or skills and 3) specific accommodations, modifications, and supports that must be provided for students in accordance with their IEPs. All of these resources provide the foundation for the additional supports and interventions proposed for priority schools, focus schools, and other Title I schools

In addition, PRDE has developed an effective instruction framework (based on current and best practices) that is aligned with the curriculum, communicated to all stakeholders, and consistent with the teacher/director evaluation system. PRDE is working to develop a defined and clearly articulated instructional model for educating of "at-risk" populations, including students with a disability, LSP, high poverty/mobility, and credit-deficient students. Again, these resources provide the foundation for the additional supports and interventions proposed for priority schools, focus schools, and other Title I schools

PRDE's Central level and district staff provide ongoing professional development to support the implementation of the content standards. These professional development activities will be ongoing in nature and ensure teachers 1) understand how the content standards are articulated across all grade levels and subject areas, 2) understand how teachers can best support student learning at key transition points in ways that close gaps and eliminate duplication, 3) know how to use instructional materials that

are aligned with PRDE's standards, 4) ensure that instructional materials are not limited to textbooks and 5) promote the use of instructional practices that are research-based and consistently implemented within each grade level and content area. This system wide professional development is part of PRDE's ongoing work and is enhanced by the additional supports and interventions proposed for priority schools, focus schools, and other Title I schools.

PRDE recognizes that balancing time and dosage expectations as a critical factor to consider throughout implementation. To address this challenge, PRDE is creating a master calendar that outlines participation in professional development activities. Schools can request additional training throughout the course of the school year. The additional training could be provided using a workshop forum or through embedded professional development and coaching support in the classroom. The additional professional development can be provided by district or Central level staff. District academic facilitators will provide on-site support four days a week. If feasible, PRDE will work to develop online resources that support these professional development areas and make it possible for teachers to access at times other than the regular school day. PRDE's approach to effective school improvement is not prescriptive. PRDE intends to support schools' efforts to improve teaching and learning by providing as many resources as possible that could help schools and teachers respond to students learning needs. Each school will collaborate with Central, regional and district staff to make customized selections of additional services and resources that best align with identified learning needs.

Ensuring Sufficient Support for Elements of PRDE's Differentiated Accountability System

PRDE assesses its overall capacity based on staff experience, staffing levels, and financial resources. PRDE has considered these factors in developing this Flexibility request and is prepared to PRDE will make the necessary resource allocation decisions to support all activities outlined in this flexibility request. PRDE believes implementation of this Flexibility request represents an long term investment in our staff and the public education system. Once implemented, the proposed resource allocation decisions can be expected to ensure that every school is properly supported and has the tools for success.

Data Driven Decision Making Training: Staff that reports to the Office of Academic Affairs will complete training on data driven decision making. This training will enable PRDE staff at the Central and district levels to ensure schools align their CSP and school improvement or action plans with identified needs. It will also promote a continuous improvement to approach to improving teaching and learning. Central level Academic Programs Directors will develop trainings for Superintendents, Assistant Superintendent and School Directors in how to use assessment data to track student progress, provide support to students no making progress and ensure that our schools use effective practices for diverse learners.

District Leadership Teams: Each district will create a district-based leadership team composed of the superintendent, academic personnel at the district level, and staff responsible for specific school improvement and technical assistance services. Additional members can be added to the team as necessary. This leadership team will develop, support, and facilitate the implementation of policies and procedures that formalize the approach to school improvement that PRDE is proposing in this Flexibility Request.

Use of Dashboards: PRDE's newly created dashboards have been described in detail in previous sections of Principle 2. PRDE will use the dashboards to support ongoing data collection and tracking of progress toward PRDE, district, and school goals. The use of dashboards builds PRDE's internal capacity by

making it possible to 1) identify and disseminate best practices and 2) monitor and report performance at the island, district and school levels. PRDE will also use the dashboards to identify when a school or district needs assistance so that it can initiate a proactive conversation and request an interim action plan that outlines the remediation or corrective steps the school or district will take in order to demonstrate the expected level of progress.

Comprehensive Approach to Managing and Integrating Professional Development: Professional development activities will be designed based on the results of the evaluation instruments of each teacher and school director as required by *Reglamento No. 8036* as amended by *Reglamento No. 8207* and *Reglamento No. 8035* as amended by *Reglamento No. 8208*. These professional development and growth opportunities for both teachers and school directors will incorporate professional development vehicles that are research based and shown to be successful in increasing the teacher and school director effectiveness. In addition to professional development related to individual observation of educator performance consistent with PRDE's response to Principle 3, PRDE will continue to provide its teachers and school directors with on-going, high-quality, job embedded professional development that is aligned with school's instructional program. PRDE has identified various actors within its system that can provide job embedded professional development including 1) professional development specialists, 2) former teachers and school directors, and 3) identified outstanding current teachers and school directors to impart their knowledge and skills to other professionals.

In addition, PRDE recognizes the need to develop resources to build school capacity in four target areas:

- Training Academic and Special Education Facilitators to develop a comprehensive professional development plan on the use of the standards in the classroom that incorporate an experiential component so that teachers have a better understanding of the purpose, intent, depth, and clarity of the standards and how to integrate it effectively in daily planning and assessment.
- Supporting all educators as they work to understand the standards and the curriculum materials
- Providing intensive support for curriculum alignment and resource development in schools
- Providing access to and professional development in the use of data to driven instructional decision making

Accountability for improving school and student performance

PRDE will implement systems to monitor both priority and focus schools to ensure that these schools are receiving the support they require to meet student needs and address the root causes of their performance problems. Monitoring will take place least three times a year and may include desktop monitoring and/or site visits. PRDE intends to implement oversight practices that facilitate the development of a culture of communication within schools, among schools, across districts and regions and throughout PRDE's system of public education. Because PRDE is a unitary system, oversight from Central level is provided to schools throughout the system.

PRDE's Central level recognizes the importance of consistent and appropriate implementation of its differentiated accountability system. In order to demonstrate appropriate implementation and follow

through of the planned interventions with priority and focus schools, PRDE will engage an external evaluator. The external evaluator will be responsible for monitoring the processes associated with the planning, implementation, and results of interventions with priority and focus schools. PRDE also intends to provide a similar assurance of the fidelity of implementation for a subset of the remaining non-categorized Title I schools that demonstrate the greatest needs.

Priority schools

Once identified, priority schools undergo a comprehensive needs assessment. As the needs assessment is realized, priority schools will have access to an external provider. The goal of providing each priority school with an external provider is to enhance the supports available through the existing PRDE infrastructure and ensure that the level of support available to these schools is sufficient to result in fundamental changes. Providers will be assigned to priority schools based on their areas of expertise. This method for assigning providers helps ensure that priority schools receive support that directly addresses the issues causing the low proficiency rates.

After realizing their needs assessment, priority schools work with their assigned provider and academic support from the Central and district levels to revise their Comprehensive School Plan (CSP, detailed in PRDE's response to Principle 1) and develop a customized School Improvement Plan. The specific oversight and supports provided by the different offices across the 3 levels within PRDE is presented above.

Priority schools that fail to improve academic achievement after full implementation of interventions will be considered for additional measures to safeguard students' right to quality public education. *Reglamento No 6743 del Personal Docente del DEPR*, as amended by *Reglamento 7292* and *Reglamento 8037*, establishes the procedures for relocating PRDE personnel. *Reglamento No. 7565 de Medidas Correctivas y Acciones Disciplinarias* regulates disciplinary actions that PRDE can take against personnel that are not fulfilling their duties guaranteeing due process. Ultimately, Law No. 149 *Ley Orgánica del Departamento de Educación de Puerto Rico del 15 de Julio de 1999* as amended, assigns responsibility for the closing of schools to the Secretary of Education.

In the event that schools do not achieve the expected performance outcomes in 3 years, PRDE will re-evaluate the school's capacity to implement the turnaround interventions. First, PRDE will review evidence of implementation of planned initiatives. If planned interventions have not been implemented, PRDE's Central level staff will work with regional, district and school leadership/teachers to determine why interventions were not implemented. Structural, procedural or operational barriers to implementation will be identified and future interventions for these schools will be adjusted to ensure the observed barriers are addressed in the future.

If planned interventions have been attempted, PRDE's Central level staff will work with regional, district and school leadership and teachers to determine why performance targets were not attained. PRDE will then reinstate the turnaround process and support the school identifying and selecting more effective interventions that have the greatest probability of closing the identified achievement gaps. The selection of new interventions must be based on the analysis of need and prioritization of goals and with respect to the school's demonstrated capacity to implement interventions during the previous 3 years. As is done with other schools, schools re-entering a 3 year cycle can only select interventions that align

with PRDE's larger framework for school turnaround and are consistent with PRDE's plan to implement its content standards and implement related instructional practices. PRDE will only approve interventions that are clearly aligned with identified needs and can be reasonably expected to increase student achievement, close achievement gaps and improve the school's performance.

To further support implementation of the newly selected interventions, PRDE will facilitate the reassignment of school personnel to ensure optimal support for planned interventions. PRDE will also increase the level of technical and administrative support provided to these schools by the Central, regional and district levels.

Focus Schools

All focus schools will undergo a comprehensive needs assessment using a model that was developed by the Florida and Islands Comprehensive Center (FLICC). Focus schools will use historical information and outputs from the comprehensive needs assessment to modify their CSP. As indicated above, the design and elements included within the CSP are detailed under PRDE's response to Principle 1. Revisions to focus schools CSP include: 1) enhancing each school's action plans to reflect attention to the need to evidence continuous improvement 2) the inclusion of significant interventions that modify past approaches to teaching and learning and 3) detailing the support the school will need from PRDE's academic program directors in the Office of the Undersecretary of Academic Affairs. Taken together, these revisions provide a multi-pronged approach to addressing the factors that contributed to observed achievement gaps.

The specific oversight and supports provided by the different offices across the 3 levels within PRDE is presented above. However, as has been stated in previous sections of Principle 2, various staff within the Office of the Undersecretary of Academic Affairs will support implementation of action plans by focus schools. Staff from the Office of Academic Affairs, will provide ongoing technical assistance related to teaching and learning and ensure that implementation data are reported through the PRDE dashboard system. By providing this support to focus schools, PRDE's Central level can monitor progress among focus schools on a monthly basis and engage supports throughout the school year as deemed necessary based on available performance data.

Ongoing monitoring of the interventions will be a part of the action plan for continuous improvement. Ongoing monitoring must be included in order for a focus school's action plan to be approved. The Office of the Undersecretary of Academic Affairs and the external evaluator will review focus schools' implementation efforts and identify areas where the planned interventions do not appear to meet student learning needs. In those cases, information will be fed back to the school for modification of either the plan or the implementation strategy to ensure success for the students and the school.

Focus schools will be responsible for providing evidence of the implementation of their action plan every three months. This evidence will inform desktop monitoring to be conducted by the Office of the Undersecretary of Academic Affairs. In addition, the external evaluator will monitor the schools directly via site visits at least once a year.

While school status is no longer annually determined by AYP attainment, reporting will continue to be a vital part of PRDE transformation strategies. Public reporting of school performance enables parents and communities to hold schools accountable for student and school outcomes. In turn, public accountability challenges schools to demonstrate that they are meeting expectations and encourages

them to nurture healthy relationships with their community.

Leveraging ESEA Section 1116(b)(10) Funds to Improve School and Student Improvement

PRDE believes schools will benefit from using funds reserved under 1116(b)(10) to significantly extend learning time through different types of interventions targeted at substantially increasing student achievement and/or improving retention and graduation rates. PRDE seeks the flexibility to use the funds that it would otherwise be required to reserve for certain activities for schools that were identified for improvement to support a number of new and existing school improvement initiatives.

These activities include providing tutoring to students who fail to meet achievement goals, professional development activities for staff, and activities that OSI staff has found to be effective in SIG schools, such as leadership academies.

PRDE will prioritize the use of 1116(b)(10) to address the needs of focus schools and any Non-SIG priority school. This use of funds could be necessary if SIG funds are insufficient to support the needs in non-SIG priority schools. Other Title I schools may also be served with 1116(b)(10) funding. That funding decision will be based on evidenced improvement needs in order to allow schools to use 1116(b)(10) funds to implement activities that address the needs identified by the school in their CSP. The schools that will be eligible to use these funds would include those schools that are eligible to apply for 1003 (a) funds but may also be extended to include schools that do not match the eligibility criteria established for 1003 (a). Similar procedures related to the application and oversight used for 1003 (a) funds will be considered for use for these funds. More generally, PRDE seeks flexibility to allow schools use of these 1116(b)(10) funds to support school improvement interventions, including those currently being used with SIG schools that have been found to be effective. In this way, PRDE can use these funds to scale up new efforts to improve teaching and learning in all Title I schools.

As the USDE is aware, PRDE currently uses a significant percentage of the funds that are required for school improvement activities under the statute for Supplemental Education Services (SES). PRDE will allow Title I School Directors to include a request in their Comprehensive School Plan for additional funding for SES services to provide specific interventions for students in their school performing in the PPAA and PPEA at a pre-basic or basic level in the core content areas. The Office of the Undersecretary of Academic Affairs will then review the request to approve or deny based on whether SES services for those specific students would be an appropriate intervention. This determination will be made based on 1) prior experience of the student with the SES program (where applicable) or 2) evidence that another academic initiative or intervention currently available for the student would not be more effective. If the Title I school request for additional funding is approved, the Office of Federal Affairs will then assign funds previously required to be reserved under section 1116(b)(10) for SES services to that specific Title I school budget. The Title I School Director will then hold an Open House for SES providers to present the parents of the identified students the available options.

PRDE will require Title I schools that want to use 1116(b)(10) funds for SES services to 1) provide SES providers with a data-based description of the learning needs for their school 2) provide an analysis of student achievement by subgroups and 3) provide a summary of the instructional interventions being

used by the school to address the identified learning deficits.

PRDE will require SES providers to demonstrate that the services they intend to provide 1) respond to the specific learning needs of the students they are assigned, 2) enhance or extend the instructional improvement strategies the school has selected as part of its school improvement planning process. In all instances, SES vendors will be required to demonstrate how their academic interventions align with research-based best practices and improve student academic achievement.

**PRINCIPLE 3: SUPPORTING EFFECTIVE INSTRUCTION
AND LEADERSHIP**

3.A DEVELOP AND ADOPT GUIDELINES FOR LOCAL TEACHER AND PRINCIPAL EVALUATION AND SUPPORT SYSTEMS

Select the option that pertains to the SEA and provide the corresponding description and evidence, as appropriate, for the option selected.

<p>Option A</p> <p><input checked="" type="checkbox"/> If the SEA has not already developed and adopted all of the guidelines consistent with Principle 3, provide:</p> <ul style="list-style-type: none">i. the SEA’s plan to develop and adopt guidelines for local teacher and principal evaluation and support systems by the end of the 2012–2013 school year;ii. a description of the process the SEA will use to involve teachers and principals in the development of these guidelines; andiii. an assurance that the SEA will submit to the Department a copy of the guidelines that it will adopt by the end of the 2012–2013 school year (see Assurance 14).	<p>Option B</p> <p><input type="checkbox"/> If the SEA has developed and adopted all of the guidelines consistent with Principle 3, provide:</p> <ul style="list-style-type: none">i. a copy of the guidelines the SEA has adopted (Attachment 10) and an explanation of how these guidelines are likely to lead to the development of evaluation and support systems that improve student achievement and the quality of instruction for students;ii. evidence of the adoption of the guidelines (Attachment 11); andiii. a description of the process the SEA used to involve teachers and principals in the development of these guidelines.
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Our Guiding Vision

Teaching and learning are complex processes composed of many interconnected elements. These elements include, but are not limited to, the effectiveness of the teacher and that of the school director. Research shows that effective school leadership promotes effective instruction and that effective instruction promotes higher levels of student academic achievement. Recognizing the interactions between instructional leadership, teaching, and student achievement, PRDE has committed to enhancing, adopting, and implementing a comprehensive island-wide educator evaluation system. PRDE's new educator evaluation system will provide an effective means of evaluating teachers and school directors (principals) and promote their continuous professional development

The creation, adoption, and implementation of comprehensive evaluation systems is part of PRDE's larger strategic initiative to improve student achievement. Elements of this larger strategic initiative have been detailed in PRDE's response to Principles 1 and 2. In responding to Principle 3, PRDE will highlight how it will connect measures of student performance to the evaluation of teachers and school directors. PRDE's vision for an effective educator evaluation system is one that is fair and appropriate, results in increases in student achievement and ensures that teachers and school directors across the island receive high quality professional development necessary support their growth and improve their practice. PRDE seeks to create an educator evaluation system that provides feedback to all educators within the public school system so that our students and schools can achieve high degrees of success. PRDE believes that its new educator evaluation system should be developed using feedback from a broad cross-section of the stakeholders that make up the education community in Puerto Rico.

The evaluation systems will be guided by professional standards for teachers and school directors (*Puerto Rico's Professional Standards for Teachers 2008* and the *PRDE Profile of the School Director* respectively). PRDE's new comprehensive teacher and school director evaluation systems will be linked to a professional development system that will provide supports (i.e., training, coaching, guidance, resource materials, etc.) to teachers and school directors with specific areas for improvement. Again, PRDE intends to integrate the changes it realizes by implementing the reforms described in its responses to Principles 1 and 2 to its implementation of a robust and effective teacher evaluation system.

Plan to Develop a New Educator Evaluation System

Define System Elements

Puerto Rico's comprehensive educator evaluation system will be consistent with ESEA flexibility requirements and will measure the educator's performance both in direct and indirect behaviors. PRDE is committed to developing, adopting, piloting, and implementing, teacher and school director evaluation and support systems that:

1. Use of a set of professional standards by which educators will be evaluated
2. Use diagnostic, formative, and summative evaluation processes that will provide information to guide and improve instruction.

3. Use a rating scale consisting of four (4) performance levels for teachers and five (5) for directors.
4. Use multiple measures of educator effectiveness that include student achievement and growth.
5. Include evaluations on a regular basis with cycles that are, differentiated for new and experienced educators.
6. Provide timely feedback and focused professional development opportunities that align with the results of with observations and performance evaluations, paying specific attention to the needs of educators determined to be in need of improvement
7. Use results from evaluations to inform personnel decisions as established in PRDE's relevant guidelines.

With regard to student growth, we provide a description of our growth evaluation model for Spanish Language Arts and mathematics in grades 4 through 8 under 1.C of this document. PRDE is currently working with a nationally recognized vendor to identify high quality options for measuring student achievement and evaluating growth in other grades and content areas. In those cases, PRDE will develop or adopt measures that reflect standards-based learning objectives and have demonstrable evidence of validity and reliability. PRDE will also develop or adopt a growth model for these cases that is appropriate for the data types and sources.

Final guidelines, regulations and evaluation instruments for teacher and school director evaluation systems will be finalized by December, 2014.

Develop and Revise Necessary Policies

PRDE's efforts to create a new educator evaluation systems will be informed by two *Guidelines* that outline the processes for evaluating both teachers and school directors. These are: *Reglamento No. 8036* and *Reglamento No. 8035*, respectively. The new educator evaluation system will also be informed by Law 149 *Ley Orgánica del Departamento de Educación de Puerto Rico de Julio 15 de 1999* as amended.

Law 149 established the original design of teacher and school director evaluation systems. In June 2011, PRDE adopted the two Guidelines cited above, to allow for elements of an educator evaluation systems that were not originally defined in Law 149. The initial adoption of these new Guidelines made it possible for PRDE begin to revise its teacher and school director evaluation systems. PRDE's first accomplishments in this area include the development of new evaluation tools that were piloted in our 29 cohort I SIG schools.

In June 2012, the Puerto Rico Department of Education amended both Guidelines (*Reglamento No. 8036*, which was previously *Reglamento No. 8207* and *Reglamento No. 8035* which was previously *Reglamento No. 8208*). These amendments were intended to 1) allow for additional improvements to existing teacher and school director evaluation assessment instruments 2) formalize PRDE's support for educators' continuous professional growth, 3) establish goals for teacher and school director performance, and 4) foster compliance among all educators with efforts to improve students

achievement and schools academic performance.

It should be noted that PRDE will also adhere to Law No. 170 of Uniform Administrative Procedures, the *Reglamento No 6743 del Personal Docente del DEPR* as amended by *Reglamento 7292* and *Reglamento 8037*, and *Reglamento No. 7565 de Medidas Correctivas y Acciones Disciplinarias*.

Engage Stakeholders in the Development of the Evaluation Tool

During school year 2010-2011, evaluation experts from Institutions of Higher Education in Puerto Rico were engaged to support the process of revising PRDE's evaluation instruments. This committee of evaluation experts proposed items to be included in PRDE's new evaluation system. During school year 2011-2012, the PRDE conducted several meetings with teacher and school organization leaders to obtain input about the newly developed evaluation instruments. Next, the Office of the Undersecretary of Academic Affairs convened focus groups with school directors and teachers across all seven regions. A total of 34 school directors and 90 teachers participated in these focus groups. Feedback from the focus groups was also incorporated into the further development of these instruments.

Once the pilot results from our cohort I SIG schools are analyzed, these Guidelines will be reviewed again *and if needed additional amendments will be* discussed with teachers, school directors, superintendents, PRDE central office personnel, non-profit organizations as well as public and private institutions of higher education.

Going forward, PRDE will continue to use the established process of revising these Guidelines to define and build consensus around achieving a robust teacher and school director evaluation system.

Review Best Practices

Current research on comprehensive teacher and school director evaluation systems identifies several elements that increase the effectiveness and success of these systems. These elements include: 1) start all performance evaluations with a clearly defined set of performance expectations, 2) ensure performance expectations are clearly reflected in the evaluation instrument, 3) collect data through performance observations, 4) provide formative opportunities to help employees improve their performance, and 5) hold a final culminating activity, such as a summative conference, to close the evaluation cycle. PRDE recognizes the merit in these recommendations and intends to develop evaluation systems that reflect these principles.

Test and Validate Evaluation Tools

PRDE used current research, guidance from evaluation expert, input from stakeholders and administrative guidelines, to develop evaluation tools for use with teachers and school directors. These tools are currently being validated (2012-2013) through a pilot implementation in cohort I SIG schools (see attachment 16 regarding the evaluation implementation timeline). Data gathered from this pilot can be used to enhance future iterations of teacher and school director evaluation instruments and prepare for island-wide implementation. PRDE will continue using its pilot evaluation tools during 2013-2014 and 2014-2015. These pilots will be realized with priority schools, including all 50 SIG schools. It should be noted that growth models data will be incorporated into the piloting of new evaluation tools as soon as this data becomes available.

Define the Implementation Timeline

By 2015-2016 school year, PRDE will have a robust evaluation system that will be fully implemented in every public school. Each PRDE teacher will be evaluated and receive an annual performance rating based on four performance levels, and each school director will be evaluated and receive an annual performance rating based on five performance levels. These performance ratings will also be used to guide opportunities for professional growth and to form the basis for personnel decisions.

Define the Evaluation Process

The PRDE will implement a cyclical evaluation process that is consistent with national teacher and school director evaluation trends as well as current thinking in this field of study. PRDE's cyclical evaluation process will include the following six steps:

1. form evaluation committees
2. schedule and conduct school and classroom visits
3. compile evidence of the teacher/school director's performance
4. Analyze standardized student academic achievement data
5. Analyze and synthesize all available performance information and compare to the pre-defined performance levels
6. Present and discuss the evaluation results with the teacher/school director and determine the need for additional support

Incorporate Indicators of Student Growth

In accordance with the USDE documents entitled *ESEA Flexibility* and *ESEA Flexibility Frequently Asked Questions*, student growth will be an integral part of the PRDE evaluation systems. Starting in 2013-2014 school year as a pilot, 20% of these evaluations will be based on student growth data based on the results from the PPAA and PPEA for the tested subjects and grades. The Office of the Undersecretary of Academic Affairs will review this weighting for possible modification over time with feedback from stakeholders.

Key Milestones/Activities	Detailed Timeline	Party/Parties Responsible	Significant Obstacles
Implementation of a pilot version of the teacher evaluation system in the 29 SIG schools. The evaluation pilot will be analyzed and necessary revisions will be made in consultation with stakeholders.	2012-2013	Office of School Improvement	Although delays are possible, PRDE anticipates that revisions to the current evaluation systems could be completed on time for the next evaluation cycle.

Implementation of the teacher and school director evaluation system in a representative sample of all school grades and subjects assessed; 20% of the evaluation will be based on student performance data. Implementation will be analyzed and necessary revisions will be made in consultation with stakeholders.	2013-2014	Office of the Undersecretary of Academic Affairs InDePM; ICAAE School Districts	
Implementation of the teacher and school director evaluation system in a representative sample of all school grades and subjects assessed.	2014-2015		
Implementation of the teacher and school director evaluation system in all schools.	2015-2016		The implementation of the evaluation systems island-wide is contingent on the availability of valid assessments for all subjects and all teachers.

Provide Necessary Professional Development

PRDE’s efforts to provide educators with professional development are informed by two administrative documents. These documents are 1) *Puerto Rico’s Professional Standards for Teachers 2008* and the *PRDE Profile of the School Director*. These documents establish the standards for effective teaching and leading that promote student learning and enhance professional practice. The documents define what high quality teaching and leading should look like in all PRDE’s K-12 schools.

PRDE’s Teacher’s Professional Development Institute (InDePM) developed the Professional Standards for Teachers in Puerto Rico in 2008. These standards were based on the National Board for Professional Teachers Standards and the Interstate New Teacher Assessment and Support Consortium. The eleven professional standards for teachers in Puerto Rico are as follows:

- Standard 1: Knowledge of the academic subject
- Standard 2: Teaching knowledge
- Standard 3: Instructional strategies
- Standard 4: Learning environment
- Standard 5: Diversity and special needs
- Standard 6: Evaluation and assessment
- Standard 7: Integration of technology

- Standard 8: Communication and language
- Standard 9: Family and community
- Standard 10: Information gathering
- Standard 11: Professional development

It should be noted that all professional development activities PRDE has been providing to teachers and school directors are consistent with the standards set forth in these administrative documents. This is true of all of the Centrally-planned professional development activities PRDE has discussed in Principle 1 and Principle 2. PRDE will monitor to ensure that PD Intervention Plans for teachers and school directors, as well as those that are included within schools CSP and school improvement plan or action plan, are guided by the PRDE's professional standards.

As it continues to develop its educator evaluation system, PRDE will continue to use its established administrative procedures to ensure that professional development activities 1) are planned, designed and structured to provide continuous opportunities to master content and 2) include strategies and the methodologies needed to improve student achievement. PRDE will expand existing procedures related to follow up and evaluation of the application of the acquired knowledge. Expansion of existing procedures will also include creating a method for validating that teacher and school director evaluations are tied to systems of support and opportunities for professional growth and that these supports are differentiated to meet the individual needs of specific personnel.

PRDE believes that these efforts will improve instruction and leadership in Puerto Rico's public schools.

Clarify Intended Use of Results from the Evaluation System

The outputs of PRDE's evaluation system can be used to make decisions related to: 1) assignment of teachers to professional development courses, 2) determining eligibility for performance awards/incentives, 3) determining eligibility to serve in leadership roles at both the school and district level, 4) determining the need for individualized professional development plans that respond to identified areas of weakness, 5) assignment of a mentor.

Outputs of PRDE evaluation system will also be used to update personnel files to include performance evaluation information and to determine the need for reassignment to duties with less direct impact on students. PRDE is currently evaluating its policy and regulatory framework to identify changes that would be necessary to allow PRDE to take additional personnel actions.

The Teacher Evaluation System

Purpose

Puerto Rico's teacher evaluation system will aim to:

- Improve student performance
- Improve the quality of instruction in each of Puerto Rico's classrooms and schools.
- Improve the teaching and learning process
- Create more effective communication channels through which teachers can access feedback

on their performance.

- Improve the system for providing staff development and training to teachers.
- Establish a comprehensive teacher evaluation system that includes teacher participation.
- Establish a comprehensive teacher evaluation system that will not only serve to effectively evaluate teachers but will also impact students' performance.

Highly Qualified Teachers

Consistent with state and federal law, *Circular Letter 16-2011-2012* ensures that all students have access to highly qualified teachers. Accordingly, the PRDE aims to ensure that all of the teachers that teach the basic academic subjects meet the following requirements: hold at least a bachelor's degree, hold a regular teacher certificate, and have demonstrated competence in the subject that he/she teaches.

Overview of the System

Puerto Rico's comprehensive teacher evaluation system will be consistent with ESEA flexibility requirements and will measure the teacher's performance both in direct and indirect teaching behaviors. In addition, this system includes seven other evaluation components including but not limited to:

1. Use of a set of professional standards by which educators will be evaluated, specifically *Puerto Rico's Professional Standards for Teachers 2008*.
2. Use diagnostic, formative, and summative evaluation processes that will provide information to guide and improve instruction.
3. Use a rating scale consisting of four (4) performance levels for teachers
4. Use multiple measures of educator effectiveness that include student achievement and growth.
5. Include evaluations on a regular basis with cycles that are, differentiated for new and experienced educators.
6. Provide timely feedback and focused professional development opportunities that align with the results of with observations and performance evaluations, paying specific attention to the needs of educators determined to be in need of improvement
7. Use results from evaluations to inform personnel decisions as established in PRDE's relevant guidelines. The comprehensive teacher evaluation system will be linked to a professional growth system that will provide supports to teachers with identified areas for improvement.

The Evaluation Rubric

As indicated above, the current version of teacher evaluation tool is a working document. The current evaluation tool was created in collaboration with various stakeholders and included involvement and participation of teachers from Puerto Rico's four teacher representative groups, the *Asociación de Maestros, Únete, Educamos, and Educadores Puertorriqueños en Acción*. Additional stakeholders included groups cited in previous sections within Principle 3 and personnel from PRDE's Central, regional, and district levels.

The teacher evaluation rubric was designed using as framework the Puerto Rico Professional Standards for Teachers approved in 2008, which is based on the National Board for Professional Teachers Standards (NBPTS) and the Interstate New Teacher Assessment and Support Consortium. The evaluation instrument is organized into three major evaluation domains: (a) effective use of

sound pedagogical techniques, (b) professional development tied to teacher performance, and (c) professional responsibilities of the teacher. Only domain one is further expanded into five indicators that reflect specific performance criteria upon which the teacher will be evaluated. The teacher rubric has fifty-four (54) indicators across these three categories: The teaching category includes *6 sub-categories and a total of 26 indicators* (Curricula (4 indicators), Planning of Learning (7 indicators), Reform Strategies (3 indicators), Learning Process (4 indicators), Evaluation of Learning (6 indicators), and Classroom Organization (2 indicators). The professional development category includes *1 category and 7 indicators*. The duties and responsibilities category includes *1 category and 21 indicators*.

Performance indicators articulated through the evaluation system are intended to focus all educators' attention on meeting the diverse needs of their students. Specific quality indicators included in the evaluation rubrics are intended to assist educators to develop an increasing understanding the diversity of their students, to identify students' unique needs, develop differentiated instructional strategies to meet those needs, and continually utilize data to assess the effectiveness of their strategies

The teacher evaluation rubric has a point scale of 100 and each indicator is scored between 3 and 0. A score of 3 indicates that the teacher exceeds expectations. A score of 2 indicates that the teacher meets expectations. A score of 1 indicates that the teacher partially meets expectations. A score of 0 indicates that the teacher does not meet expectations.

Teacher Evaluation Cycle

As indicated above, PRDE's cyclical evaluation process will include the following six steps:

1. form evaluation committees
2. schedule and conduct school and classroom visits
3. compile evidence of the teacher performance
4. Analyze standardized student academic achievement data
5. Analyze and synthesize all available performance information and compare to the pre-defined performance levels
6. Present and discuss the evaluation results with the teacher and determine the need for additional support

Implementation of each step within this cycle will be governed by procedures and is described in more detail below.

Form the Evaluation Committee

The Evaluation Committee can only be comprised of the School Director and the district level Academic Facilitator for a given teacher's subject area. Participation of the Academic Facilitator can be requested by the director or the teacher. The Evaluation Committee will ensure each teacher has a complete understanding of the evaluation process and the key dates associated with his/her evaluation before said evaluation takes place. PRDE strongly recommends that initial meetings between the teacher and Evaluation Committee should occur as early in the school year as possible. The Office of the Undersecretary of Academic Affairs is developing specific guidelines around when these meetings should occur.

Consistent with *Reglamento 8207*, a school director will identify all district level Academic Facilitators that he/she may need to participate in the Evaluation Committee thirty (30) days before the beginning of the fall semester. It should be noted that academic facilitators of any subject area cannot visit the teacher by himself/herself. However, the school director can make the visit by himself/herself or be accompanied by the facilitator of the subject area.

Schedule and Conduct Classroom Visits

The director will schedule coordinate the classroom visits during the school year. Sixty (60) days before the start of the fall school calendar, the school director (with or without assistance from the district level) will establish the classroom visit schedule to be followed during the upcoming academic year. The classroom visit schedule includes only the initial classroom visit. Changes to the schedule are allowed with a justifiable cause. Copies of annual evaluation schedules will be collected by individual school districts and provided to the Office of the Undersecretary of Academic Affairs and the Office of Federal Affairs.

Teachers will be provided with an orientation session that explains the evaluation procedure and receive a copy of the classroom visit schedule and the evaluation tool on or before (60) days from the beginning of the fall semester. All teachers that are appointed after the initial sixty (60) school days will receive an orientation regarding the evaluation procedure during their first ten (10) days in the school.

The frequency of the evaluations will occur as follows:

- New teachers and non-tenured teachers will be evaluated twice a year.
- Tenured teachers will be evaluated once every three years. Any tenured teacher rated as “Partially Meets” or “Does Not Meet” the expectations on their last evaluation will be evaluated twice a year until their performance improves.

Classroom observations will serve as basis for an analysis of the teacher’s understanding of the dispositions and skills required to be an effective teacher. The observation will be conducted using the evaluation rubric discussed above.

The initial classroom visit is used to diagnose each teacher’s strengths and areas in need of improvement. The results of this visit are shared and discussed with the teacher. During this discussion, the teacher and the school director 1) set performance goals and 2) plan for a second observation.

The second classroom visit is scheduled based on the amount of time necessary to assess the teacher’s attainment of the goals set at the end to the first visit. After the second visit is conducted, the results are also shared with the teacher. If the teacher obtains a performance level of “partially meets expectations” then he/she has the option to request a third observation. The third observation will be used as a summative assessment.

Compile Evidence Of The Teacher Performance

The school director or evaluation committee will compile evidence of the teachers’ performance. This evidence should include classroom observation data and student performance data. Only data from

the current academic year can be compiled for an annual evaluation. School directors and/or Evaluation Committees must ensure that there is sufficient data to make a reasonable assessment of the teacher’s performance across all 54 elements included in the evaluation rubric. In addition, school directors and/or Evaluation Committees must ensure that there is sufficient data to make a reasonable determination of the teacher’s present performance level.

Analyze Standardized Student Academic Achievement Data (Current)

As has been indicated, the guidelines for the teacher evaluation system include a student growth component. PRDE is still working to finalize details related to attribution of student performance to teachers individual evaluations. In every instance, a minimum of 20% of the overall teacher evaluation will be based on student growth data based on either results from the PPAA and PPEA island-wide assessments currently in place or the formative assessments that will be developed and implemented by 2015-2016. PRDE will continue its pilot efforts for determining the right weight for student achievement scores for teachers that 1) teach multiple subjects, 2) teach non-tested subjects/grades and/or 3) share responsibility for LSP and SWD subgroups. The Office of the Undersecretary of Academic Affairs will engage stakeholders throughout this process and gather feedback from teachers and school directors regarding the impact and effects of this weighting.

Analyze Standardized Student Academic Achievement Data (Future)

In addition to developing and implementing a growth model that can be used with PRDE’s current state assessments, the PRDE in consultation with the PRDE Technical Advisory Committee (TAC) and guidance from expert sources will explore a series of assessment methods that can enable PRDE to develop appropriate assessments that make it possible to incorporate a measure of student growth in evaluations of teachers teaching non-tested grades and subjects. These measures should be compatible with the data types and sources implemented in these currently non-tested grades and content areas and consistent with the definition of student growth in the ESEA Flexibility document (or any document that ED may publish to supersede that document).

In coordination with the TAC, PRDE’s Standards and Assessment Unit and the Academic Program Directors will conduct a rigorous analysis of the standards for the non-core content areas and grades to identify an appropriate assessment method that incorporates a student growth model for each. PRDE’s Standards and Assessment Unit will then work with the relevant academic programs to develop the corresponding assessment instruments. These may include Performance Tasks administered during the school year using curricular maps as a basis, different types of Portfolios and the use of other types of formative assessments. In all content areas where it may be feasible a standardized assessment will be developed.

A general timeline for assessment development for non-core content areas and grade levels is below:

Key milestones or activities	Detailed timeline	Party or parties responsible
RFP for developing formative assessments and/or other appropriate assessments for the non-tested grades and subjects	2013-2014 school year	Standards & Assessment Unit; OFA; Auxiliary Secretary of Academic

		Services
Formative assessments and/or other appropriate assessments field test and revision	2014-2015 school year	Vendor and Standards & Assessment Unit
Implementation of the new formative assessment and/or other appropriate assessments for the non-tested subject and grades	2015-2016 school year	Vendor and Standards & Assessment Unit

Formative assessments will consist of pre- and post-tests to measure students' individual growth per semester. PRDE will contract an external provider to lead the logistics of the assessment development process where PRDE teachers, academic facilitators and academic program directors will develop together the assessments aligned to the new standards. PRDE teachers will have the opportunity to identify and create the instruments consistent with their subject matter and grades taught. PRDE will establish SLOs and, after the administration of the pre-tests, academic facilitators will analyze the results with teachers and design an academic work plan based on the identified needs. During this process, teachers will receive technical assistance through coaching and mentoring to support them in achieving the SLOs. Pre-tests and post-tests will be administered twice per school year: pre-tests in August and January, post-tests in December and May.

PRDE will issue an RFP to begin the development of the formative assessments during the 2013-2014 school year and will begin field testing in 2014-2015. By 2015-2016, operational formative assessments will be available to evaluate individual student academic growth. This proposal was discussed with the TAC at our most recent meeting (June 2013). The TAC evaluated and approved the methodology proposed in light of the formative assessments currently being used in States with approved ESEA Flexibility plans. A proposed series of milestones for the development of these assessments appears below:

- Month 1: Engage vendor to create assessments; solicit teacher engagement/application and ensure representation for all regions, districts and schools from all categories
- Month 2: develop timeline to engage teachers in process of developing formative assessments; plan professional development; schedule educator professional development;
- Month 3: hold PD session; teachers have 30 days to test out new assessment practices;
- Month 4: hold PD session and gather feedback; teachers have 30 days to continue to test out assessment practices
- Month 5: determine which subject areas should be addressed first; develop timeline for each subject area and grade; estimate costs;
- Month 6 : determine where timeline acceleration might be needed; identify pain points
- Month 7-10: complete round 1 of item development with teacher participation component led by vendor; assess at end of this period/milestone

Analyze And Synthesize All Available Performance Information And Compare To The Pre-Defined Performance Levels

PRDE's teacher evaluation system requires that all teachers comply with the functions established under Law Number 149 of July 15, 1999, as amended, and the norms and regulations of the

Department. All teachers are subject to an evaluation of their performance in their professional functions. PRDE's evaluation system is designed to encourage ongoing professional development of our educators and enrich the quality of the teaching and learning in each school. PRDE's evaluation system was designed, and will be implemented, in ways that benefit the academic achievement of Puerto Rico's public school students.

PRDE has defined performance level expectations that facilitate the categorization and management of teacher performance across the public education system. In alignment with the objectives stated in *Reglamento 8036* as amended by *Reglamento 8207* PRDE will apply the performance level descriptions presented below when implementing its teacher evaluation system. School directors and/or Evaluation Committees must use available data collected through the evaluation process to justify the selection of a performance levels.

- **Exceeds Expectations:** A teacher who scores between 100% and 95%. A teacher that scores at this level demonstrates a performance that consistently exceeds the expectations for each factor included in the evaluation. A teacher that *exceeds expectations* usually demonstrates a wide spectrum of effective instructional behaviors. The PRDE will encourage these teachers to participate in professional development activities as resources or serve as mentors to their peers. In addition, if funds are available, teachers could be rewarded or incentivized to make additional, meaningful contributions to PRDE's system by supporting the dissemination of the effective practices they use.
- **Meets Expectations:** A teacher who scores between 94% and 80%. A teacher that scores at this level demonstrates adequate professional performance the expectations for each factor included in the evaluation. A teacher that *meets expectations* is executing the responsibilities associated with his/her teaching role but their overall performance is not exceptional and could be improved. The PRDE will encourage these teachers to participate in professional development activities through the development of individualized professional development plans. In addition, PRDE will encourage these teachers the option of partnering with teachers in their school that have been identified as exceeding expectations
- **Partially Meets Expectation:** A teacher who scores between 79% and 70%. A teacher that scores at this level demonstrates professional performance does not consistently satisfy the expectations for each factor included in the evaluation. Teachers that *partially meet expectations* has some deficiencies that influence their ability to demonstrate a wide spectrum of effective instructional behaviors but these deficiencies can be remediated. PRDE will require these teachers to develop a two year individualized professional development plan that specifies unique professional development activities that correspond to the observed performance weaknesses. PRDE will set interim performance expectations to track individual progress in improving their instructional practice.
- **Does Not Meet Expectation:** A teacher who scores lower than 69%. A teacher that scores at this level evidences demonstrates significant deficiencies on the expectations for each factor included in the evaluation. Teachers that *do not meet expectations* lack critical skills and abilities necessary to be an effective teacher and these deficiencies significantly affect the teacher's ability to execute his/her professional responsibilities teaching role. PRDE will require these teachers to develop a two year individualized professional development plan that specifies an integrated and comprehensive set of professional development activities that correspond to both global and specific performance weaknesses. PRDE will set quarterly

performance expectations for these teachers to track individual progress in improving their instructional practice.

The above mentioned levels and descriptions are subject to change based on 1) feedback and recommendations from stakeholders and 2) continued development of PRDE's educator evaluation system

As has been indicated, All proposed professional development activities will be aligned with *Puerto Rico's Teachers' Professional Standards*. School Directors are responsible for ensuring teachers' compliance with their individual Intervention Plans. Individual professional development plans will be discussed with the teacher and evidence of progress will be required. Teachers who are rated as "Partially meet" or "Do Not Meet" the level of execution expected will be subjected to the corresponding personnel actions which range from written warnings to suspensions that lead up to separation from employment for demonstrable unsatisfactory job performance. Disciplinary actions will be imposed only after the term for the completion of the PD Intervention Plan has been completed or expired.

Present And Discuss The Evaluation Results With The Teacher And Determine The Need For Additional Support

Feedback is an integral component of an effective teacher evaluation and support systems. The results of the evaluation of teacher performance will be shared with each teacher. Teachers will be provided with a summary of a) areas of strength, b) teacher needs, c) areas in need of improvement, and d) recommendations that the teacher should consider implementing to improve his/her practice. A copy of the evaluation instrument used for the summative evaluation will also be given to the teacher. This feedback will be given in a timely manner and teachers will receive feedback on their performance throughout the school year so that they can take action to improve their practices immediately.

Consistent with national trends in evaluation systems, a final conference with the teacher will also be held towards the end of the year. PRDE believes these "end of year" conferences are important and provide educators with an opportunity to reflect on the professional growth they have realized during the course of the year. The teacher will have ten (10) days from the day of the conference to present comments on the results of the evaluation to the evaluation committee. The evaluation, including the comments of the teacher will be forwarded to the Auxiliary Secretary of Human Resources and filed with the Puerto Rico Department of Education.

Individual Copies of teacher evaluations will also be provided to the Office of the Undersecretary of Academic Affairs so that system-wide analyses of teacher performance can be conducted. As indicated above, the school director will develop a two year Professional Development Intervention Plan for the teachers that "Partially Meet" or "Do Not Meet" the expectations. The plan will indicate the professional development activities the teacher will participate to foster growth and strengthen the areas identified in need of improvement as indicated in the Evaluation Report and the Guide to Classroom Visits: Diagnostics, Formative/Summative. Copies of these professional development plans will also be provided to the Office of Academic Affairs so that the appropriate analyses of teachers' professional development needs can be better understood and tracked.

The School Director Evaluation System

Purpose

Puerto Rico's school director evaluation system will aim to:

- Maximize the efficiency and effectiveness of the use of all resources within the PRDE system.
- Improve school director effectiveness
- Provide professional development opportunities for school directors.
- Establish the model for improving teaching and learning processes through changes in school directors' instructional leadership.
- Establish a system that shows the relationship between the work of the school director, teacher performance, and student achievement.
- Serve as the basis for personnel decisions.
- Create a mechanism for coordinating the practice of instructional leadership across school districts in order to improve teaching and learning process.
- Align PRDE's execution of instructional leadership with national standards for school administrators such as the Interstate School Leaders Licensure Consortium (ISLIC) 2008 standards.

Overview of the System

Puerto Rico's comprehensive school director evaluation system will also be consistent with ESEA flexibility requirements and will capture, in rich detail, the work of the school director performing those instructional leadership actions that directly impact student performance (i.e., mentoring, coaching, and working directly with teachers and students). Measures of student growth will be an integral part of this evaluation system. Student academic growth will be the primary measure.

This evaluation system includes seven other evaluation components including but not limited to:

1. Use of a set of professional standards by which educators will be evaluated, specifically PRDE profile of school director
2. Use diagnostic, formative, and summative evaluation processes that will provide information to guide and improve instruction
3. Use a rating scale consisting of four (4) performance levels
4. Use multiple measures of educator effectiveness that include student achievement and growth
5. Include evaluations on a regular basis with cycles that are, differentiated for new and experienced educators
6. Provide timely feedback and focused professional development opportunities that align with the results of with observations and performance evaluations, paying specific attention to the

needs of educators determined to be in need of improvement

7. Use results from evaluations to inform personnel decisions as established in PRDE's relevant guidelines. The comprehensive school director evaluation system will be linked to a professional growth system that will provide supports to educators with identified areas for improvement

The Evaluation Rubric

The process used to develop the school director evaluation rubric was exactly the same as the process used to develop the teacher evaluation rubric. This process included participation of evaluation experts, teachers, directors and other stakeholders and involved several meetings over the course of two years. A total of 34 school directors participated in these focus groups. Feedback from these focus groups was also incorporated into the further development of these instruments.

The school director evaluation rubric was designed using as a framework PRDE's Profile of the School Director and is consistent with ISLIC standards. The school director evaluation tool is divided into three major domains including: (a) school director instructional leadership, (b) school director administrative leadership, and (c) school director organizational management and ethics. The school director evaluation rubric has 46 indicators organized in three categories. The Leadership category has 17 indicators; the Administration category has 20 indicators, and the Organization and Ethical Performance category has 9 indicators.

Performance indicators articulated through the evaluation system are intended to focus all educators' attention on meeting the diverse needs of their students. Specific quality indicators included in the evaluation rubrics are intended to assist educators to develop an increasing understanding the diversity of their students, to identify students' unique needs, develop differentiated instructional strategies to meet those needs, and continually utilize data to assess the effectiveness of their strategies.

The school director evaluation rubric has a point scale of 100 and each indicator is scored between 4 and 0. A score of 4 corresponds to "Excellent" performance; a score of 3 corresponds to "Good" performance; a score of 2 corresponds to "Average" performance; a score of 1 corresponds to "Below Average" performance, and a score of 0 indicates "Deficient" performance.

School Director Evaluation Cycle

The school director annual evaluation cycle will consist of seven components:

1. Form evaluation committees
2. schedule and conduct school visits
3. compile evidence of the School Director performance
4. Analyze standardized student academic achievement data
5. Analyze and synthesize all available performance information and compare to the pre-defined performance levels
6. Present and discuss the evaluation results with the School Director and determine the need for additional support

Form Evaluation Committee

The school director evaluation committee will consist of a maximum of three members, all of whom will be School District Superintendents. The Evaluation Committee will ensure each school director has a complete understanding of the evaluation process and the key dates associated with his/her evaluation before said evaluation takes place. PRDE strongly recommends that initial meetings between the school director and Evaluation Committee occur as early in the school year as possible. The Office of the Undersecretary of Academic Affairs is developing specific guidelines around when these meetings should occur.

Consistent with *Reglamento 8208*, the district superintendent will identify and appoint the necessary members of the Evaluation Committee thirty (30) days before the beginning of the fall semester.

Schedule and Conduct School Visits

The district superintendent will schedule coordinate the school visits during the school year. Sixty (60) days before the start of the fall school calendar, the district superintendent (with or without assistance from the Evaluation Committee) will establish the school visit schedule to be followed during the upcoming academic year. The school visit schedule includes only the initial classroom visit. Changes to the schedule are allowed with a justifiable cause. Copies of annual school evaluation schedules will be collected by the Office of the Undersecretary of Academic Affairs.

School Directors will be provided with an orientation session that explains the evaluation procedure and receive a copy of the school visit schedule and the evaluation guide on or before (60) days from the beginning of the fall semester. All school directors that are appointed after the initial sixty (60) school days will receive an orientation regarding the evaluation procedure during their first ten (10) days in of being in the school director position.

The frequency of the evaluations will occur as follows:

- New directors and directors with a probationary status will be evaluated twice a year.
- Tenured directors will be evaluated at least once a year. Any tenured director rated as "Average", "Below Average" or "Deficient" on their last evaluation will be evaluated twice a year until performance improves.

Currently, the regulations guiding the school director evaluation process require that each school director receive a minimum of two on-site school observations/visits. The dates/times of these observations/visits must be mutually agreed upon by the school director and the members of the Evaluation Committee. It is PRDE's goal that these observations/visits effectively capture, measure, and provide feedback on the school director's instructional leadership behaviors that directly impact student performance. Each observation of school director's performance will be conducted at the school when he or she is in direct contact with teachers, faculty, staff, students, and other members of the learning community. In addition, these observations will be conducted in a manner consistent with the evaluation objectives, criteria, and other instructional leadership actions that haven an impact on the teaching and learning process. The proposed criteria consist of the following three domains that are included in the school director evaluation rubric discussed in detail above

Compile Evidence of the School Director's Performance

The Evaluation Committee will compile evidence of the school director's performance. This evidence should include school observation data and student performance data. Only data from the current academic year can be compiled for an annual evaluation. The Evaluation Committees must ensure that there is sufficient data to make a reasonable assessment of the school director's performance across all 46 elements included in the evaluation rubric. In addition, the Evaluation Committees must ensure that there is sufficient data to make a reasonable determination of the school director's present performance level.

Analyze Standardized Student Academic Achievement Data (Present)

The evaluation committee will analyze the results from the evaluation collaboratively with school directors. This analysis should include all the data gathered including an analysis of student growth.

As has been indicated, the guidelines for the school director evaluation system include a student growth component. PRDE is still working to finalize details related to attribution of student performance to school director's individual evaluations. In every instance, beginning in the 2013-2014 school year, a minimum of 20% of the overall school director evaluation will be based on student growth data based on results from the PPAA and PPEA assessments. PRDE will continue its pilot efforts to determine the right weight for student growth scores for school directors to ensure that all relevant factors are considered and accounted for. The Office of the Undersecretary of Academic Affairs will engage stakeholders throughout this process and gather feedback from teachers and school directors regarding the impact and effects of this weighting.

Analyze Standardized Student Academic Achievement Data (Future)

In addition to developing and implementing a growth model that can be used with PRDE's current state assessments, the PRDE in consultation with the PRDE Technical Advisory Committee (TAC) will explore a series of assessment methods that can enable PRDE to develop appropriate assessments that make it possible to incorporate a measure of student growth in evaluations of teachers teaching non-tested grades and subjects.

In coordination with the TAC, PRDE's Standards and Assessment Unit and the Academic Program Directors will conduct a rigorous analysis of the standards for the non-core content areas and grades to identify an appropriate assessment method that incorporates a student growth model for each. PRDE's Standards and Assessment Unit will then work with the relevant academic programs to develop the corresponding assessment instruments. These may include Performance Tasks administered during the school year using curricular maps as a basis, different types of Portfolios and the use of other types of formative assessments. In all content areas where it may be feasible a standardized assessment will be developed.

In addition, PRDE will work to partner with Regional Centers and other experts to develop assessments for grades and subjects in which assessments are not required or readily available. PRDE will actively seek guidance from expert sources, including ED, with respect to appropriate student growth measures that are compatible with the data types and sources implemented in these currently

non-tested grades and content areas and are consistent with the definition of student growth in the ESEA Flexibility document (or any document that ED may publish to supersede that document). The development of these assessments will be done in such a way that they can be used with all teachers and are appropriate for use with LSP and students with disabilities.

A general timeline for assessment development for non-core content areas and grade levels is below:

Key milestones or activities	Detailed timeline	Party or parties responsible
RFP for developing formative assessments and/or other appropriate assessments for the non-tested grades and subjects	2013-2014 school year	Standards & Assessment Unit; OFA; Auxiliary Secretary of Academic Services
Formative assessments and/or other appropriate assessments field test and revision	2014-2015 school year	Vendor and Standards & Assessment Unit
Implementation of the new formative assessment and/or other appropriate assessments for the non-tested subject and grades	2015-2016 school year	Vendor and Standards & Assessment Unit

Analyze And Synthesize All Available Performance Information And Compare To The Pre-Defined Performance Levels

PRDE has defined performance level expectations that facilitate the categorization and management of school director performance across the public education system. In alignment with the objectives stated in *Reglamento No. 8035* which was previously *Reglamento No. 8208*. PRDE will apply the performance level descriptions presented below when implementing its school director evaluation system. Evaluation Committees must use available data collected through the evaluation process to justify the selection of a performance levels.

Each school director will receive an evaluation rating that is divided into five (5) rating levels listed below ranging from most effective to least effective:

- **Excellent** - A school director who scores between 100% and 90% in each criteria. A school director that scores at this level demonstrates a performance that *consistently exceeds the expectations* for each factor included in the evaluation. A school director that *exceeds expectations* usually demonstrates a positive influence in others, is a team player and leads efforts to reach academic and administrative excellence. The PRDE will encourage these school directors to participate in professional development activities and serve as resources or serve as mentors to their peers. In addition, if funds are available, school directors could be rewarded or incentivized to make additional, meaningful contributions to PRDE’s system by supporting the dissemination of the effective practices they use.
- **Good**- A school director who scores between 89% and 80% in each criteria. A school director that scores at this level demonstrates a performance that *meets the expectations* for each factor included in the evaluation. In addition, a director at this level shows understanding of his/her day to day duties and has the capacity to work in a team. The PRDE will encourage these school directors to participate in professional development activities through the

development of individualized professional development plans. In addition, PRDE will encourage these school directors the option of partnering with school directors in their districts that have been identified as exceeding expectations

- **Average-** A school director who score falls between 79% and 70% in each criteria. A school director that scores at this level demonstrates a performance that *occasionally meets the expectations* for each factor included in the evaluation. A Although he/she knows his/her duties and responsibilities, this director does not perform these duties at their full extent. PRDE will require these school directors to develop a two year individualized professional development plan that specifies unique professional development activities that correspond to the observed performance weaknesses. PRDE will set interim performance expectations to track individual progress in improving their instructional practice. This oversight will be provided by district superintendents
- **Below Average-** A school director who score falls between 69% and 60% in each criteria. A school director that scores at this level demonstrates a performance that *does not meet the expectations* for each factor included in the evaluation. A school director performing at this level needs professional assistance to develop effective instructional leadership skills. His/her performance demonstrates a minimal understanding of what is necessary lead a school effectively. PRDE will require these school directors to develop a two year individualized professional development plan that specifies an integrated and comprehensive set of professional development activities that correspond to both global and specific performance weaknesses. PRDE will set quarterly performance expectations for these teachers to track individual progress in improving their instructional practice. The PRDE could also take further disciplinary actions to safeguard the students' achievement.
- **Deficient** - A school director who scores between 59% and 0% in each criteria. A school director scoring at this level does not show evidence of administrative, academic and fiscal skills. There is no evidence of efficiency to lead the school and does not work collaboratively with the personnel in his/her school. PRDE will require these school directors to develop a two year individualized professional development plan that specifies an integrated and comprehensive set of professional development activities that correspond to both global and specific performance weaknesses. PRDE will set quarterly performance expectations for these teachers to track individual progress in improving their instructional practice. In addition, PRDE will assign a District Superintendent to work with the school director on sight at least 40% of the time. The PRDE could also take further disciplinary actions to safeguard the students' achievement.

The above mentioned levels and descriptions are subject to change based on 1) feedback and recommendations from stakeholders and 2) continued development of PRDE's educator evaluation system

Present And Discuss The Evaluation Results With The Teacher And Determine The Need For Additional Support

As is true with PRDE's teacher evaluation systems, PRDE believes that feedback should be an integral component of an effective administrator evaluation and support systems. Consistent feedback as defined in the guidelines for the new evaluation system will be provided on a regular basis. School directors will be provided with feedback that includes a description of their (a) areas of strength, (b) professional development needs, (c) skills in need of improvement, and (d) recommendations for improving their practice.

A copy of the evaluation instrument used for the summative evaluation will also be given to the teacher. This feedback will be given in a timely manner and teachers will receive feedback on their performance throughout the school year so that they can take action to improve their practices immediately.

Consistent with national trends in evaluation systems, a final conference with the school director will also be held toward the end of the year. PRDE believes these “end of year” conferences are important and provide educators with an opportunity to reflect on the professional growth they have realized during the course of the year. The school director will have ten (10) days from the day of the conference to present comments on the results of the evaluation to the Evaluation Committee. The evaluation, including the comments of the school director will be forwarded to the Auxiliary Secretary of Human Resources and filed with the Puerto Rico Department of Education. The Auxiliary Secretary for Human Resources and/or PRDE’s Legal division is responsible for executing corresponding personnel actions which range from written warnings to suspensions that lead up to separation from employment for demonstrable unsatisfactory job performance.

Copies of school director evaluations will also be provided Individual Districts to the Office of the Undersecretary of Academic Affairs so that system-wide analyses of school director performance can be conducted. As indicated above, the District Superintendent will develop a two year Professional Development Intervention Plan for the school directors that score at or below the “Average” performance level. The plan will indicate the professional development activities the school director will participate to foster growth and strengthen the areas identified in need of improvement as indicated in the Evaluation Report and the Guide to Classroom Visits: Diagnostics, Formative/Summative. Copies of these professional development plans will also be provided to the Office of Academic Affairs so that the appropriate analyses of school directors’ professional development needs can be better understood and tracked.

3.B ENSURE LEAs IMPLEMENT TEACHER AND PRINCIPAL EVALUATION AND SUPPORT SYSTEMS

- 3.B Provide the SEA’s process for ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, including mechanisms to review, revise, and improve, high-quality teacher and principal evaluation and support systems consistent with the SEA’s adopted guidelines.

As previously discussed, PRDE is a unitary system serving as both the state educational agency (SEA) and a single local educational agency (LEA). The forgoing description of the educator evaluation system has been designed by PRDE’s Central level, in collaboration with stakeholders throughout the Puerto Rico public education system. It’s implementation is directed by Central level staff similar to how LEAs conduct implementation in other States.

In order to fulfill the SEA level responsibilities, PRDE’s Office of Academic Affairs and Office of Federal Affairs will hold quarterly meetings with Regional and District staff to track the degree of implementation at the school level. The implementation timeline below indicates that PRDE will begin by implementing the new evaluation tools with the cohort I SIG schools. Stakeholders from these schools will provide feedback on the evaluation system based on their experiences. Within 3 months, PRDE will incorporate this feedback, update the related user manual and expand the implementation of

the second version of the evaluation tool with an increased number of schools. The oversight and monitoring systems PRDE has designed for each category of schools has been described in the previous section. These same oversight and monitoring mechanisms will also be used to track implementation of the use of the tool for each group of schools as indicated below. Once PRDE's Flexibility Waiver is approved, PRDE will work with US Department of Education staff to modify timelines as needed to ensure compliance with ESEA Flexibility requirements.

- 2012-2013: cohort I SIG schools
- 2013-2014: all priority schools and focus and/or reward schools that volunteer
- 2014-2015: all priority schools, all focus schools and all reward schools;
- 2015-2016: all schools

Implementation and barriers that are affecting schools' efforts to use these new systems will be documented and reported through these existing channels. To fulfill its SEA role, PRDE's OAA and OFA staff will meet twice a year with staff responsible for oversight of interventions in these schools. These meetings are in addition to the stakeholder focus groups described below. Progress will be reported and significant system-wide barriers for implementation will be discussed with the Secretary at the end of the year. PRDE recognizes and is prepared to work diligently to address possible barriers such as: limited understanding of the new system, ineffective rating categories, delays in the development of other assessments and/or delays in fine tuning growth scores. Recommendations for removing barriers through administrative or management changes will be proposed at the beginning of each new school year. PRDE will also seek out experts in these areas to help facilitate full and timely implementation.

The PRDE is committed to teacher and school director evaluation systems that are not only consistent with the requirements of ESEA flexibility as outlined by the USDE, but also reflect current national trends in the area of teacher and school director evaluation. The PRDE also recognizes that these systems may need to be adjusted throughout the development process. PRDE is committed to continuing to engage members of the immediate learning community and other educational stakeholders that act as partners in Puerto Rico's public school system. PRDE believes that involvement of diverse stakeholders in the process of improving these guidelines will provide the PRDE with advantages that will help to ensure the success and sustainability of a new comprehensive educator evaluation system. Stakeholder involvement is important because it will help establish shared ownership of the evaluation system and the instruments that are used to conduct the evaluations. Stakeholder involvement will also create a reciprocal process whereby stakeholders will have the opportunity to impact the quality of the decision-making process as well as benefit from the decisions made. In addition, engaging the stakeholders who know and experience the educational environment is critical so that all data considered in the development process responds to the educational setting. This contextualization will also reflect the collective will of the PRDE, the PR public school system, and the communities served.

As has been indicated, PRDE is piloting recently created evaluation tools with cohort I SIG schools. Moving forward from this starting point, PRDE expects it will need to develop additional tools that strengthen the quality of our evaluation system. These tools may include enhanced evaluation instruments and professional development plan templates. PRDE will review and possibly revise, to improve our educator evaluation systems every two years. When modifications are required and appropriate, the PRDE will follow the processes outlined in the sections below. An overview of the full

plan to develop, adopt and implement the teacher and school director evaluation systems is presented in the following table.

Key milestones or activities	Detailed timeline	Party or parties responsible	Evidence
Pilot to validate the teacher's evaluation system in 29 SIG schools	2012-2013 school year	Office of School Improvement; Office of the Undersecretary of Academic Affairs; InDePM	Evaluations completed by school directors and other relevant documentation
Focus groups with teachers and school directors of the 29 SIG schools to review the evaluation system.	2012-2013 school year	Office of School Improvement; Office of the Undersecretary of Academic Affairs; InDePM	Focus group discussion guidelines; summaries of focus group discussions; attendance sheets
Focus groups with different stakeholders to review and revise teacher and school director evaluation systems.	Summer 2013	Office of the Undersecretary of Academic Affairs; InDePM; ICAEE	Focus group discussion guidelines; summaries of focus group discussions; attendance sheets
Revision of the guidelines/regulations and evaluation instruments for teachers and directors.	August-December 2013	Undersecretary of Academic Affairs; InDePM; ICAEE; Auxiliary Secretary of Academic Services	Agenda, minutes, agreements, attendance sheets, revised documents
Dissemination of revised documents related to teacher and school director evaluation systems to all sectors for feedback based on their experience and theoretical knowledge.	August-December 2013	Office of the Undersecretary of Academic Affairs; InDePM; ICAEE; Auxiliary Secretary of Academic Services	Copies of documents disseminated and official communications
Orientation to academic staff, parents and other stakeholders on the teacher and school director evaluation systems.	2013-2014 school year	Office of the Undersecretary of Academic Affairs; InDePM; ICAEE;	Copies of documents disseminated, official communications and attendance sheets
Pilot implementation of the teacher and school director evaluation systems in a representative sample of schools including the growth model of student achievement.	2013-2014	Office of the Undersecretary of Academic Affairs; InDePM; ICAEE; School Districts	Evaluations completed by school directors and other relevant documentation
Continue to seek input from stakeholders	2013-2014	Office of the Undersecretary of	Focus group discussion guidelines; summaries

		Academic Affairs; InDePM; ICAAE	of focus group discussions; attendance sheets
Continue pilot implementation of the teacher and school director evaluation systems in a representative sample of schools including.	2014-2015	Office of the Undersecretary of Academic Affairs; InDePM; ICAAE; School Districts	Evaluations completed by school directors and other relevant documentation
Implementation of teacher and school director evaluation systems island-wide.	2015-2016	Office of the Undersecretary of Academic Affairs; InDePM; ICAAE; School Districts	Evaluations completed by school directors and other relevant documentation

Evaluation Systems

Overview of Evaluation Review Procedures

As has been detailed under the Teacher and School Director implementation steps outlined above, PRDE will monitor implementation of the new evaluation systems. Specifically, PRDE states it will forward results from educators' evaluations, to the Auxiliary Secretary of Human Resources, which is responsible for executing corresponding personnel actions which range from written warnings to suspensions that lead up to separation from employment for demonstrable unsatisfactory job performance. PRDE also states that it will forward copies of educator evaluations to the Office the Undersecretary of Academic Affairs so that system-wide analyses of school director performance can be conducted The Office of Academic Affairs will collect data such as the number of educators assigned to each performance evaluation rating, retention rating, and student performance outcomes correlated to performance evaluation ratings at the school and district levels. PRDE will also explore other uses of information about educator effectiveness to facilitate additional system-wide improvements in teaching and learning. PRDE's evaluation system support effective instructional practice to ensure that all students, including LSPs and students with disabilities, develop academic language to experience success in academic core curriculum.

As has been indicated PRDE will use data from the teacher and school director evaluation pilots along with feedback from focus group meetings to revise its evaluation instruments. Revised evaluation instruments would be presented at another round of focus group meetings to allow for stakeholder review, comment and buy-in.

PRDE envisions that revisions to current evaluation instruments would include an expansion of each of the domains currently included in the teacher and school director tools. PRDE will explore the benefits of, further defining the specific performance requirements for both the teacher and the school director in each of these domains. It should be noted that PRDE will be careful not to create evaluation tools that are too cumbersome to be effective. PRDE also hopes to further refine its evaluation system in ways that would allow for a more objective, and quantitative, evaluation of performance of both teachers and school directors within each domain. Again, any proposed revisions to PRDE's evaluation instruments would be shared with evaluation experts and internal and external stakeholders. The Office of the Undersecretary of Academic Affairs would be responsible for leading efforts to revise PRDE's educator evaluation system.

Advisory Committee on Teacher & School Director Evaluation Systems

The Secretary will designate distinguished and experienced members of the Island's Education and Private sectors to serve on an Educator Quality Advisory Committee to provide consultation and input on revising applicable regulations, evaluation guidelines and instruments. This committee will be constituted during the 2013-2014 school year as the teacher and school director evaluation systems are piloted. PRDE believes the use of an Advisory Committee will help ensure that Puerto Rico's evaluation systems are appropriate and fair, and that a diverse group of stakeholders are engaged in the revision process. The members of this Advisory Committee will at a minimum consist of stakeholders from the following groups: (a) key PRDE personnel (b) university and nationally recognized experts in the area of teacher and school director evaluation, (c) the Council on Education of Puerto Rico, (d) teacher and school director representative organizations, (e) parent representative, (f) special Education parent representative, (g) Representative from the private business sector.

Plan to Review of Current Educator Evaluation Tools

The Office of School Improvement will convene focus groups to review the pilot implementation of teacher and school director evaluations. Each focus group will consist of no more than 10 members from the educational community and could include teachers, school directors, academic facilitators, and parents. These members will come directly from the 29 cohort I SIG schools that are piloting the teacher and school director evaluation tools. PRDE values the feedback from participants in the piloting of our new educator evaluation tools. PRDE will leverage the insights and experiences from these individuals to inform revisions to the evaluation instruments, implementation templates, and/or administrative guidelines. Additional focus groups with selected practitioners from across the seven regions to obtain information about the perceived validity of these instruments. Participants will be asked to provide feedback on the content of the observation instruments as well as the professional growth plan templates.

The Office of School Improvement in collaboration with the Office of the Undersecretary of Academic Affairs will analyze input gathered during all focus groups and share all results with the Office of the Undersecretary of Academic Affairs. The Office of School Improvement has developed a method to code and organize data obtained from these focus group into meaningful categories of recurring themes. Specific attention will be paid to the alignment of the instruments with the professional standards, knowledge, skills, and dispositions the instruments are meant to address.

From a research and development perspective, a focus group methodology offers PRDE the advantages of developing and implementation of comprehensive educator evaluation system that reflects teacher and school director feedback. More specifically, focus groups will allow the PRDE to gain a variety of perspectives that will provide a balanced viewpoint on the instruments being piloted. These focus groups will also enable PRDE to ensure that stakeholders have the opportunity to provide their perspective, hear what others have to say and consider one's own views within the context of others.

Support Systems

Professional Growth Plans

Research indicates that poor teacher and/or school director performance can result in low student achievement. As such, PRDE will ensure that any educator who is not determined to be performing at

the highest performance level has opportunities to participate in ongoing professional development. PRDE's professional development is based on the Professional Standards for Teachers in Puerto Rico in 2008. Given the rigor of these standards, PRDE believes its professional development can remediate poor teacher or school director performance. Through its comprehensive educator evaluation system, PRDE has also made additional supports available to teachers and school directors and believes that these supports will improve on educators' professional practice. In addition, PRDE's comprehensive teacher and school director evaluation systems includes a requirement to develop a formal professional development plan. These professional development plans will align with educators' specific areas of need, ensure the provision of targeted assistance to help both teachers and school directors improve their practice, and be monitored throughout the school year.

Consistent with the national trends in educator evaluation systems, PRDE will ensure educators' professional development plan developed cooperatively and reflect the ideas and insights of Evaluation Committee members, school directors, and teachers. Evaluation Committees, which include school directors and District Superintendents, will be responsible establishing and managing implementation timelines within professional development plans and measuring and reporting accomplishments realized at the end of the two year cycle. Completion of these improvement plans are realized at the school level, completion rates are tracked by the district level staff as well as the monitoring and oversight supports that exist throughout the system. Summary level data is forwarded to OAA and OFA for island-wide tracking.

Professional Development and Related Support Systems

The Office of the Undersecretary of Academic Affairs will convene a second advisory committee focused on professional development and related support systems. The goal of this advisory committee will be to develop a strategy for ensuring PRDE provides rigorous professional development opportunities and support systems that align with the needs of its teachers and school directors, This Advisory Committee will provide input and recommendations to the Office of Academic Affairs and will include stakeholders from the following groups: (a) key PRDE personnel, (b) university and national experts in the area of teacher and school director evaluations, (c) the Council on Education of Puerto Rico, (d) teacher and school director representative organizations, (e) the PRDE InDePM, and (f) the PRDE ICAAE. The Advisory Committee will also facilitate focus groups with educators as well as district staff will be conducted.

The Advisory Committee members will leverage 1) feedback collected from its meetings with stakeholders 2)summary analyses of feedback collected by the Office of School Improvement and 2) aggregate reports of performance for educators from the pilot implementation of PRDE's evaluation system to make recommendations for PRDE's professional development offerings and related supports. These recommendations will consider PRDE's existing professional development offerings, including those discussed in PRDE's response to Principle 1 (related to college and career read standards and making the curriculum accessible to all students) and Principle 2 (related to the differentiated professional development that will be made available to educators in different categories of schools AND the planned development of a system that facilitates the management of PRDE's professional development offerings). PRDE recognizes the need to create and provides educators with various opportunities for customized professional development and will help educators balance these offerings with logistical time constraints. To this end, PRDE will offer teachers and school directors on-going,

high-quality, job embedded professional development that is aligned with school’s comprehensive instructional program. The job embedded professional development will be provided by professional development specialists, former teachers and school directors, and outstanding current PRDE teachers and school directors who will share their knowledge and skills with their colleagues.

PRDE’s first priority is to identify gaps in the existing support systems and create modifications that improve both the quality and availability of supports for both teachers and school directors. Professional development and growth opportunities for both teachers and school directors will incorporate research-based content and strategies shown to be successful in increasing teacher and school director effectiveness.

Aligning Evaluations of Teacher Performance with Professional Development

Professional development activities will be designed based on the results of the evaluations instruments of each teacher and school director as required by *Reglamento No. 8036* as amended by *Reglamento No. 8207* and *Reglamento No. 8035* as amended by *Reglamento No. 8208*. Consistent with this requirement, the Office of the Undersecretary of Academic Affairs reviewed relevant research and developed a model to inform the creation of individual professional development plans. The model is comprised of the eighteen strategies identified below in Exhibit 18. This model will be particularly helpful to teachers of mathematics, science, and Spanish; subject areas where Puerto Rico’s students struggle the most.

Exhibit 18. Strategies to Guide Professional Development

Observed Deficiency	Topics to Incorporate into Professional Development
Aligning and Implementing Curriculum	<ul style="list-style-type: none"> • Curriculum alignment and instructional material selection • Curriculum implementation • Curriculum replacement units
Collaborative Structures	<ul style="list-style-type: none"> • Partnerships with scientists and mathematicians in the industry and universities • Professional networking • Study groups
Examining Teaching and Learning	<ul style="list-style-type: none"> • Action research • Case discussions • Examining student work and thinking, and scoring assessments • Lesson study
Immersion Experiences	<ul style="list-style-type: none"> • Immersion in inquiry in science and problem solving in mathematics • Immersion into the world of scientists and mathematicians

Practicing Teaching	<ul style="list-style-type: none"> • Coaching • Demonstration lessons • Mentoring
Additional Strategies	<ul style="list-style-type: none"> • Developing professional developers • Technology for professional development • Workshops, institutes, courses, and seminars

Leveraging Existing Support Systems

Teachers' Professional Development Institute

In 2003, the PRDE created the Teachers' Professional Development Institute (InDePM). The mission of the Institute is to promote the human and professional development of all teachers to strengthen the intellectual and professional capabilities and creativity of teachers through capacity building on innovative teaching strategies and encourage the process of teaching-learning. PRDE's professional development offerings in support of individual educator's professional development plans can incorporate the tools, resources and strategies made available through the InDePM. These services are provided to all schools.

The InDePM is in charge of:

- Elaborating public policy on professional development of teachers within the Puerto Rico School System.
- Identifying and collect statistical evidence on the professional development needs of in-service teachers.
- Implementing innovative initiatives for teacher professional development.
- Identifying best practices, within and outside of Puerto Rico, on teacher capacity building and experiment with those that are the most promising.
- Coordinating efforts with academic programs, the Division of Teacher Certification, Office of Career Ladder for Teachers, and other units that are under the Office of the Undersecretary of Academic Affairs.
- Certifying the entities, institutions and educational organizations that provide professional development services to teachers.

Exhibit 19. InDePM 's Service Areas

1. Pre-Service	<ul style="list-style-type: none"> • Contribute to the formation of future teachers through an effective teaching practice • Facilitate inter-institutional collaboration to foster the professional development of cooperative teachers and student teachers • Collaborate in the strategic planning for the revision of the teacher preparation programs
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2. In-Service (newly hired - 0-3 years)	<ul style="list-style-type: none"> • Develop effective strategies to support new in-service teachers during the first three years • Offer professional development experience focused on teachers' needs • Develop teacher competencies to become a highly qualified teacher
3. In-Service (4 years in service and beyond)	<ul style="list-style-type: none"> • Plan and implement professional development focused in improving the academic achievement of students • Promote the collaboration with universities and schools to create professional development programs that respond to the needs of teachers and students • Promote a support structure for teaching that fosters continuous professional development, innovation, research, and evaluation of ideas and practices
4. Highly Qualified Teachers (HQT)	<ul style="list-style-type: none"> • Oversee compliance with HQT requirements • Provide technical assistance to teachers using federal funds to comply with HQT requirements • Maintain HQT teachers status through professional development programs at their grade level and subject area

Administrative Capacity and School Advisory Institute (ICAAE)

The mission of the Institute is to ensure that school directors are strong leaders; have high expectations for student, teacher and school performance; and are able to establish a positive school environment that increases the quality of each school's academic program. The ICAAE provides school directors with the necessary assistance to ensure they effectively perform their functions of increasing management capacities and strengthening the autonomy of the school. PRDE's professional development offerings in support of individual school director's professional development plans can incorporate the tools, resources and strategies made available through the Institute.

As has been stated, the Institute provides training to school directors in academic, administrative, and fiscal areas that help school directors reach high expectations and make significant changes to their school culture. The Institute conducts a needs assessment for school directors and gathers feedback from school directors across all schools related to their perceptions of their professional development needs. This need assessment assesses professional development in five key leadership dimensions: instructional leadership, planning leadership, administrative leadership, organizational leadership and ethics. The Institute plans and implements professional development for school directors based on the results of the needs assessment. A variety of modalities for professional development are available and include: one day workshops, weekend boot camps, and continuous support. The modality of these training sessions will depend mainly on the needs identified. The Institute uses a variety of resources for the planning, development and delivery of professional development services including universities, non-profit organizations, and PRDE's own resources.

In addition, the Institute provides the following standardized training programs to the following subgroups of school directors:

- all first year school directors (i.e., induction programs)
- schools directors from schools under improvement plan
- successful school directors.
- Transformational Leadership Director’s Academy for SIG schools (the Academy attends the specific needs of these school directors and places an emphasis on enhancing their leadership skills)
- School Councils training related to (Public Policy Law #149) that addresses constitution and certification of the school council, development of work plans, internal regulations, and course of financial operations

Continuous Improvement

PRDE believes that a comprehensive teacher and school director evaluation system should continuously evolve and should reflect the larger organizational evolution of schools and school systems. For this reason, the development, adoption, and implementation of Puerto Rico’s teacher and school director evaluation systems has been designed in a way that allows for continuous improvement. A periodic review of the system will occur to ensure its components are still in alignment with nationally recognized models for evaluation and federal guidelines.

PRDE will work to partner with Regional Centers and other experts to develop and use of assessments for grades and subjects in which assessments are not required or readily available. PRDE will actively seek guidance from expert sources, including ED, with respect to appropriate student growth measures.

PRINCIPLE 4

Provide an assurance that it will evaluate and, based on that evaluation, revise its own administrative requirements to reduce duplication and unnecessary burden on LEAs and schools

Reducing the Burden on Districts and Schools

The PRDE will establish the Burden Reduction Taskforce (BRT) to make recommendations on how to reduce duplication and unnecessary burdens at the district and school levels, thus devoting more time to reaching the goal of college and career readiness for all students of Puerto Rico. The Burden Reduction Taskforce will include the Undersecretary of Administration (task force lead), the Undersecretary of Academic Affairs (or representative), the Associate Secretary for Special Education, the Director of the Office of Federal Affairs (or representative), the Director from the Planning Office (or representative), the Director from the Finance Office (or budget representative), and two members of district personnel. The BRT will meet at least three times during the academic school year and once during the summer. The BRT will develop recommendations to be offered to the Governor and Secretary of Education. During development of these recommendations, the BRT will solicit input from stakeholders including superintendents, content area facilitators, other PRDE administrative staff, school directors, and teachers. The BRT will develop recommendations to reduce duplication and unnecessary burden on districts and schools using the following strategies: building on current initiatives, streamlining procedures, building district capacity, and reducing duplicative efforts.

Building on Current Initiatives

Puerto Rico has internalized the need for more efficient data systems. We have successfully proposed and received a State Longitudinal Data System Grant to streamline the P-ROW data exchange process (for more on our SLDS grant see page 30). By aligning data systems, the burden of data collection is reduced particularly in terms of data integrity across information systems (the SLDS grant includes the implementation of a department data governance and data quality model). This grant is beginning implementation and over time will improve data processing and access for the educational institutions on the island including schools via the K12 web portal. Also, the PRDE is now validating the PRDE dashboard which will make graphic representation of key data elements available to schools, thus enhancing current data evaluation and decision-making.

Streamlining Procedures

The BRT will evaluate statewide systems and establish a mandate-relief program to streamline procedures at districts and schools. Using this mechanism, BRT will examine federal and state accountability systems and align requirements where possible. The BRT will investigate areas where criteria are aligned and will attempt to streamline deadlines and submissions procedures. The BRT will also provide recommendations on how to maintain deadlines on a central master calendar for the PRDE that will also be made available to districts where submissions are required of them. The BRT will further examine the following systems and determine if statewide processes can be improved or developed for each: student accounting system, personnel system, student assessment/report card system, and online professional development registration system. The BRT will also review the cycles of all compliance monitoring cycles to determine if they can be lengthened to afford districts some reprieve from the burden of preparation. This will reduce the administrative burden placed on districts and schools by centralizing efforts into statewide processes.

The BRT will also establish a mandate-relief program by reviewing all mandates placed on districts by the PRDE and eliminating any that cannot directly be tied to the goal of college and career readiness or any means to that goal such as reducing spending or improving communication. In developing recommendations, the BRT will consider proposing the elimination of any unnecessary statutes and/or regulations related to school facilities or services.

Building District Capacity

The BRT will build district capacity by fostering communication and collaboration between districts. This program will increase the autonomy of districts and allow them to pool resources for professional development and staff training. The BRT will consider the development of a web-based resource or database within which districts could communicate about needs for specific training or resources and bring teachers and staff together across districts and regions. This cross-district pooling tool will maximize resources and allows districts to assert independent control over what is necessary in specific schools.

Reducing Duplicative Efforts

Finally, the BRT will recommend the reduction of duplicative reporting requirements. The BRT will employ a mechanism to consolidate reporting requirements where possible and eliminate any duplicative or unnecessary requirements on districts. The BRT will also explore the use of an automated report submission system that would allow districts to submit reports for feedback before deadlines to ensure they can revise reports before actual submission. Within this system, the BRT would consolidate all district submissions of plans, reports, or other related applications. The BRT will also work to develop report templates or make available report examples from previous years so that districts have a model to use. The automated submission system will also speed up the time of submission and feedback, allowing more time for thoughtful planning and collection of data.

The BRT will be responsible for accepting input from stakeholders and allowing stakeholders to comment on drafts of the recommendations, share feedback, and offer any further ideas on reducing duplication and unnecessary burdens. By reducing duplication and unnecessary burdens on districts and schools using the three mechanisms discussed above, PRDE will allow more time to be dedicated to improving student outcomes.

COVER SHEET FOR ESEA FLEXIBILITY REQUEST

Legal Name of Requester: Rafael Román Melendez	Requester's Mailing Address: PO Box 190759 San Juan, PR 00919-0759
State Contact for the ESEA Flexibility Request	
Name: Rafael Román Melendez	
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Chief State School Officer (Printed Name): Rafael Roman Melendez	Telephone: 787.773.5800
Signature of the Chief State School Officer: X 	Date: 09/10/2013
The State, through its authorized representative, agrees to meet all principles of the ESEA Flexibility.	