
Request for Window 3

Puerto Rico Department of Education



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U.S. Department of Education
Washington, DC 20202

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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 both 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 intends 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 helps to ensure that each request for flexibility approved by the Department is educationally and technically sound, and consistent with the principles described in the document titled *ESEA Flexibility* which seek to support State efforts to improve student academic achievement and increase the quality of instruction. 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 school director 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 regarding the components of the request that require additional development for approval.

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 school director 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 extension is March 31, 2015.

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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7	Flexibility District Copy
8	Lists of school by Classification and level
9	Profile of the School Director 2008 Final
10	Puerto Rico's Professional Teaching Standards 2008 Final
11	Questionnaire (March 2015)
12	Reestructuration of Districts for Flexibility
13	School Classifications
14	Theory of Action
15	ED 06 Growth Plan - School Director revised
16	ED 07 Improvement Plan - School Director revised AVR
17	ED-03 B INSTRUMENT SCHOOL DIRECTOR OBSERVATION VISIT
18	ED-03-A INSTRUMENT SCHOOL DIRECTOR OBSERVATION VISIT
19	ED-03-C INSTRUMENT SCHOOL DIRECTOR OBSERVATION VISIT
20	EM 09 Growth Plan - Teacher revised AVR
21	EM 10 Improvement Plan - Teacher revised AVR
22	ES-05 SUMMATIVE EVALUATION SCHOOL DIRECTOR
23	PEM-04 C INSTRUMENT TEACHER OBSERVATION VISIT
24	PEM-04-A INSTRUMENT TEACHER OVSERVATION VISIT
25	PEM-04-B INSTRUMENT TEACHER OBSERVATION VISIT
26	PEM-06 SUMMATIVE EVALUATION CLASSROOM TEACHER

Cover Sheet for ESEA Flexibility Request

Legal Name of Requester: Prof. Rafael Román Meléndez Secretary	Requester's Mailing Address: P.O. Box 190759, San Juan, PR 00919-0759
State Contact for the ESEA Flexibility Request Name: Enid V. Madera and Harry Valentín Position and Office: Mrs. Madera- Federal Affairs Office Director Mr. Valentín- Undersecretary for Academic Affairs Contact's Mailing Address: P.O. Box 190759, San Juan, PR 00919-0759 Telephone: Mrs. Madera(787)773-2003 Mr. Valentín: (787)773-3053 Fax: (787)759-2000 Email address: maderate@de.pr.gov valentingh@de.pr.gov	
Chief State School Officer (Printed Name): Prof. Rafael Román Meléndez	Telephone: (939) 253-5755
Signature of the Chief State School Officer: X _____	Date: March 30, 2015
The State, through its authorized representative, agrees to meet all principles of ESEA flexibility.	

Waivers

By submitting this updated ESEA flexibility request, the SEA renews its request for flexibility through waivers of the nine ESEA requirements listed below and their associated regulatory, administrative, and reporting requirements, as well as any optional waivers the SEA has chosen to request under ESEA flexibility, by checking each of the boxes below. The provisions below represent the general areas of flexibility requested.

- 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 school-wide 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.

Optional Flexibilities:

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

10. 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.
11. 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.

☒ 12. 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.

☒ 13. 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 in addition to waiver #6 so that, when it has remaining section 1003(a) funds after ensuring that all priority and focus schools have sufficient funds to carry out interventions, it may allocate section 1003(a) funds to its LEAs to provide interventions and supports for low-achieving students in other Title I schools when one or more subgroups miss either AMOs or graduation rate targets or both over a number of years.

If the SEA is requesting waiver #13, the SEA must demonstrate in its renewal request that it has a process to ensure, on an annual basis, that all of its priority and focus schools will have sufficient funding to implement their required interventions prior to distributing ESEA section 1003(a) funds to other Title I schools.

☒ 14. The requirements in ESEA sections 1111(b)(1)(B) and 1111(b)(3)(C)(i) that, respectively, require the SEA to apply the same academic content and academic achievement standards to all public schools and public school children in the State and to administer the same academic assessments to measure the achievement of all students. The SEA requests this waiver so that it is not required to double test a student who is not yet enrolled in high school but who takes advanced, high school level, mathematics coursework. The SEA would assess such a student with the corresponding advanced, high school level assessment in place of the mathematics assessment the SEA would otherwise administer to the student for the grade in which the student is enrolled. For Federal accountability purposes, the SEA will use the results of the advanced, high school level, mathematics assessment in the year in which the assessment is administered and will administer one or more additional advanced, high school level, mathematics assessments to such students in high school, consistent with the State's mathematics content standards, and use the results in high school accountability determinations.

If the SEA is requesting waiver #14, the SEA must demonstrate in its renewal request how it will ensure that every student in the State has the opportunity to be prepared for and take courses at an advanced level prior to high school.

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 ESEA flexibility, as described throughout the remainder of this request.
- 2. It has adopted 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 State's college- and career-ready standards. (Principle 1)
- 3. It will 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) no later than the 2015–2016 school year. (Principle 1)
- 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 annually make public its lists of reward schools, priority schools, and focus schools prior to the start of the school year as well as publicly recognize its reward schools, and will update its lists of priority and focus schools at least every three years. (Principle 2)

If the SEA is not submitting with its renewal request its updated list of priority and focus schools, based on the most recent available data, for implementation beginning in the 2015–2016 school year, it must also assure that:

8. It will provide to the Department, no later than January 31, 2016, an updated list of priority and focus schools, identified based on school year 2014–2015 data, for implementation beginning in the 2016–2017 school year.
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 ESEA flexibility 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 SEA 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 its ESEA flexibility request, and will ensure that all such reports, data, and evidence are accurate, reliable, and complete or, if it is aware of issues related to the accuracy, reliability, or completeness of its reports, data, or evidence, it will disclose those issues.
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, each subgroup described in ESEA section 1111(b)(2)(C)(v)(II), and for any combined subgroup (as applicable): 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. In addition, it will 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. It will ensure that all reporting is consistent with *State and Local Report Cards Title I, Part A of the Elementary and Secondary Education Act of 1965, as Amended Non-Regulatory Guidance* (February 8, 2013).

Principle 3 Assurances

Each SEA must select the appropriate option and, in doing so, assures that:

Option A	Option B	Option C
<input type="checkbox"/> 15.a. The SEA is on track to fully implementing Principle 3, including incorporation of student growth based on State assessments into educator ratings for teachers of tested grades and subjects and principals.	<p>If an SEA that is administering new State assessments during the 2014–2015 school year is requesting one additional year to incorporate student growth based on these assessments, it will:</p> <p><input checked="" type="checkbox"/> 15.b.i. Continue to ensure that its LEAs implement teacher and principal evaluation systems using multiple measures, and that the SEA or its LEAs will calculate student growth data based on State assessments administered during the 2014–2015 school year for all teachers of tested grades and subjects and principals; and</p> <p><input checked="" type="checkbox"/> 15.b.ii. Ensure that each teacher of a tested grade and subject and all principals will receive their student growth data based on State assessments administered during the 2014–2015 school year.</p>	<p>If the SEA is requesting modifications to its teacher and principal evaluation and support system guidelines or implementation timeline other than those described in Option B, which require additional flexibility from the guidance in the document titled <i>ESEA Flexibility</i> as well as the documents related to the additional flexibility offered by the Assistant Secretary in a letter dated August 2, 2013, it will:</p> <p><input type="checkbox"/> 15.c. Provide a narrative response in its redlined ESEA flexibility request as described in Section II of the ESEA flexibility renewal guidance.</p>

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.

Committee of Practitioners

The COP met on March 2014 and March 2015. The purpose of both meetings was to inform status of flexibility plan in 2014 and 2015 and discuss waivers and the implications for PRDE. Members of the COP had the opportunity to recommend specific actions regarding use of Title I funds, such as 1116 SES and 1003a.

The COP meetings allowed the participation of the diverse members, clarify their questions related to the new classification of schools, the amendment proposed in 2014 and new uses for what was SES. COP members recommend to use 1116(e) funds in broader way rather than in tutoring programs since those programs had not demonstrate effectiveness in academic achievement of students. The COP proposed narrowing the quantity of schools to be served and limit them to Priority and Focus, providing extended learning time but also administrative support, professional development and other related services to foster transformation in schools along school year. They also suggested not limiting the number of contact hours.

During the meeting held on March 2015 the COP recommend to continue with the RAD model developed, since there has not been enough time to evaluate results in a quantitative way. They also discussed the proposed uses for 1003a funds. In addition to support work plans accordingly to availability of funds and priorities identified by SAA, they approved the uses of approximately \$10.6 M for differentiated support to Priority, Focus and 5% of the lowest achieving Transition schools. Those funds will be allocated accordingly to schools application through PCEA. Priority schools will be allowed to choose two additional persons to work in a full time basis as a School Director for School Climate and a Teacher or two HQT teachers accordingly to the academic achievement needs previously identified related to its classification. In a Focus School they will follow the same procedure but can choose only one additional person from the same two positions available for Priority. The lowest 5% Transition schools will be allowed to select only one HQT teacher to support the subject with the worst results in the PPAA or PPEA.

There are 9 TAS schools which are Priority and Focus. Details regarding our 75 TAS schools were also discussed, and the recommendation of the Title I Program of using 25% of its budget in Title I personnel was approved. This action will help those schools to provide differentiated instruction and support to those students most needed.

A general description of the renewal process was discussed with the COP, which agreed with the renewal, since it provides the opportunity to hold schools and Districts accountable for results focusing in the subgroups and the achievement gaps. The COP concurred with the recommendations presented and discussed with them related to RAD instead of SES, but recommended a close monitoring of the implementation.

The COP had some questions about role definition for different interventions supported by federal funds. PRDE clarified that roles and responsibilities should be defined in each schools **Authentic and Comprehensive School Plan (PCEA)** and that each school director should work with his planning committee and “Consejo Escolar” plan the use of funds according to school needs. These decisions are not imposed by PRDE.

The COP also discussed PRDE's educator evaluation system. The COP supported the continued implementation of this process and agreed that school directors should be responsible for evaluating teachers.

Additional meetings that have taken place at the Regional/Districts levels that incorporate the input of diverse stakeholder groups are presented the next section. At the Central Level, there are regular (monthly) meetings of the Secretary's Advisory Committee. This Committee includes members from the community, businesses, universities, **parents** and educators, and they are tasked with exploring and providing feedback on various aspects of PRDE's Flexibility Plan. The Committee is broken down into various workgroups that focus on

- Parent and Community Involvement
- Students Interests
- College Readiness
- Implementation of the State Longitudinal Data System
- Policy Development
- School Classifications and Accountability
- Professional Development
- Educator Evaluation and Support System

Additional Methods of Disseminating information about PRDE's Flexibility Waiver

To increase the accessibility to information regarding the Flexibility Plan, the Department of Education developed an exclusive section on the PRDE webpage to present information about Flexibility. This section is placed prominently in our home page with different links that contain detailed information about the different components of the Plan. Through the website we keep our larger community informed about our Flexibility Plan. This information reaches about 157,494 users, and includes stakeholders from various components of the educational system. The information published on this platform has a longer range that reaches nearly 1, 538,456 people that somehow or other have a link to our education system.

The Flexibility website is targeted to reach students, parents, teachers, school directors and community. We provide:

- Detailed information about what the Flexibility Plan is and the background of its development
- A summary for the community with a simple wording
- The English version approved by the USDE and a version in Spanish
- FAQs about the Plan and the letter of the USDE extending our Plan.
- Presentations for different audiences on the implementation of Flexibility that address the new classification system of schools and the ranking list corresponding to the 2014-2015 school year,
- Press releases published in various media
- A link to a video explaining the Flexibility Plan

PRDE also maintains pages on social networks like Facebook and Twitter, through which regularly disseminates information regarding our Flexibility Plan. On these platforms we keep informed about 57,500 users and have a longer range than reaches about 125,505 people. These social media platforms

include data on the adoption and implementation of the Plan; classification of schools and the evaluation system and support for effective leadership. Throughout this mechanism we received a considerable amount of questions, which are included in the FAQs, and feedback from the community. We refer the feedback to the Academic Affairs Office to offer the information requested.

One of the main challenges for the 2014-2015 school year, in terms of the Department of Education digital platforms, is that the feedback received by users is minimal. In social media, users make comments about the information disclosed but these doesn't contain the real concerns they may have about the Flexibility Plan. It is necessary to work this year in the strategic design of channels that can serve to receive more feedback from parents, teachers, school directors and community and thus improve processes related to Flexibility Plan, implementation and dissemination.

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

Subsequent to the consultation activities that were described in PRDE's original Flexibility Request, PRDE continued to engage in extensive outreach to ensure that members of diverse communities were incorporated into this implementation of Flexibility between January 2013 and this resubmission in March 2015.

The variety of activities PRDE engaged in to ensure a diverse group of stakeholders and the consultation process is described below. It should be noted that the use of comment cards, which was initiated in 2012, continues to be a primary vehicle through which PRDE collects written feedback from all members of its stakeholder community. In addition, every school also has a box where these comment cards can be submitted.

Principle 1: College and Career readiness

Since February 2014, representatives from the education faculties of private and public Universities met monthly. The group included Deans, Student Teaching Coordinators, and directors of Teacher Preparation Programs, Directors of Graduate Studies, School Leadership Preparation Programs, and School Advisors. In these meetings, PRDE oriented the participants on the Flexibility Plan and the participants discussed the most impactful aspects to on faculty and education programs.

In June 2014, thirteen universities, including the state University, certified that new standards in Spanish, mathematics, English, science were college- and career-ready and that a student that studied under this curriculum would have a successful transition to post-secondary studies without having to take remedial courses.

Over the past year, University stakeholders have made recommendations regarding best practices to be used in PRDE's classrooms, implementation of PRDE's new standards and public policy to support teaching and pedagogy on the island. Through these monthly meetings, stakeholders continue to contribute to Puerto Rico's ongoing development of Principle 1 by focusing on key reform issues such

as the effectiveness of our college- and career-ready standards, educator preparation programs and college access.

PRDE believes these regular meetings evidence the creation of strong and effective alliances with a variety of education stakeholders. Regular meetings provide important forums to discuss issues related Flexibility Plan and engaged key stakeholders.

These meetings have also informed the revision of PRDE’s guidelines teacher preparation programs. While these draft regulations already existed, many new recommendations surfaced as a result of PRDE’s stakeholder engagement efforts. There have also been quarterly meetings among the Education Council and College Board, and PRDE to ensure that PRDE’s ongoing implementation of Flexibility addresses the most critical aspects of teacher preparation programs.

Principle 2: Accountability System:

PRDE engaged various stakeholders in the process of updating the design and platform schools use to create their ***Authentic and Comprehensive School Plan (PCEA)***. These modifications helped ensure PRDE would be able to fully implement the interventions outlined in Principle 2. The revised PCEA provides school directors with access to prepopulated data regarding their school and its classification. During their most recent monitoring visit, USDE acknowledge PRDE’s effort for developing a platform that clearly delineates the interventions required for each school classification. This includes data from school in terms of achievement gaps by subgroups, and cohort graduation rate

PRDE engaged staff at the Central and District level to develop a process for supporting school directors in analyzing performance data and developing interventions based on the school needs. PRDE’s Central Level staff facilitated a training for District and school staff including Special Assistants, Superintendents, Assistant Superintendents, Teachers, Facilitators, school directors, teachers and other community members on the main elements of the Principle 2. During this process, PRDE received feedback, questions and suggestions that were incorporated into the final PCEA design.

School communities have communicated and provided feedback to PRDE Central Level staff about Principal 2 through phone calls, emails and meetings. Common questions regarding Principle 2 included a) how to implement and demonstrate the intervention of differentiated instruction, b) how to prepare the data analysis and select appropriate interventions, c) how to interpret the new School Report Card and d) how non categorized (Transition) schools can identify significant gaps. There have been extensive conversations with stakeholders regarding how schools that met all indicators except the significant gaps could change classifications.

The Undersecretary for Academic Affairs and the Auxiliary Secretary for Planning and Educational Development have been considering the input of the school communities to develop training and established appropriate changes in documents to support and respond to the needs of these stakeholders.

PRDE holds monthly meetings with District staff to ensure the system’s capacity to meet school level. During these meetings, PRDE also facilitates conversations across schools to share the best practices and develop intervention strategies. District level staff then offers through technical assistance support to the school directors to understand clearly the reasons why their school has the current classification, the subgroup data representing priority and the necessary interventions.

Based on stakeholder feedback, PRDE decided to create and disseminate simplified versions of completed PCEAs. The target audience for these documents are parents and members of the school community. As described in previously, PRDE developed a video for parents and community that details school accountability classifications and required interventions. This video is accessible at the Districts and schools levels and PRDE encouraged that it be shown during meetings and other events where parents and community members are presents. Any parent can provide feedback on the video using the comment cards and suggestion boxes that are located at the school and District offices.

Principle 3: Educator Evaluation:

Over the last academic year, there have been nine meetings with representatives from the 37 Education faculties of the public and private universities. Participants in these meetings have included a wide range of stakeholders including Deans and Directors of Education, practice coordinator for student's education, directors of graduate studies, and coordinators of school director preparation programs and professional advisors on educational issues. In these meetings, the participants were introduced to with Flexibility Plan and discussed various aspects related to educator evaluation. They had opportunities to ask questions and make recommendations focused on increasing the quality of educator evaluation systems and PRDE's capacity to implement Principle 3 of Flexibility.

As part of this stakeholder engagement process, the instruments used in PRDE's evaluation system were discussed. PRDE received technical feedback from the coordinators of practicum/student teaching experiences and soon-to-be graduates from various teacher preparation programs. Additional feedback has been gathered through subgroup meetings of the Secretary's Advisory Committee. The subgroup worked on 1) the public policy that will establish the guides for PRDE's professional development for teachers and 2) revisions to the evaluation instruments, 3) formats for professional development plans. Detailed information regarding how PRDE gathered input on its educator evaluation process over the past four years presented in Principle 3.

Other Turn Around Principles:

Family and Community Engagement

Family and Community Engagement has historically been a challenge for PRDE due to the traditionally passive approach to participation in schools evidenced by parents and community. Over the last two years, Family And Community Engagement at the school level has become a priority defined by the Puerto Rico state government and the PRDE. In 2013 the Governor issued an executive order: **Boletín Administrativo Num OE -2013 057** to promote parental participation, establishing strategies to facilitate and increase parent participation and involvement in school activities and student achievement. In addition, OE -2013 057 includes strategies and activities to engage the community. The PRDE and the Puerto Rico Department of Family were designated as the agencies to implement the OE -2013 057.

Puerto Rico's Organic Law 149 of June 30th 1999 requires that each school create a governing school council that will make decisions on processes related to school organization and structure, and resource administration, among others. The statute establishes that all stakeholder groups be represented. All school councils include parents and a member of the community. PRDE has issued various administrative directives to foster and support creation of school level parent/community

council. In all PRDE schools, parent participants include representatives from the general population as well as the special education students and, where applicable, LSP communities. An assembly is held at the school level to appoint the parent and community representatives.

School directors disseminate information about Flexibility and collect stakeholder feedback through these school councils. Subsequent to holding an event with parents and community members, school directors submit information to the PRDE describing the event and reporting a summary of the feedback received. PRDE has created a template to facilitate the sharing of this information. Central Level staff reviews these templates to ensure that Flex is being discussed and that feedback is being considered to determine strategies for continuous parental and community engagement.

Central Level

PRDE's policy on Family and Community Engagement is established in **Circular Letter # 15 2013-2014** of July 20, 2013. The National Standards for Parental Involvement, based on Joyce Epstein's model (2001) were used as a guide to establish the parental and community engagement PRDE policy. This model includes six standards of family, school and community collaboration. These include: facilitating proactive parental and community involvement that will strengthen parental and community integration in school decision making; establish alliances and relationships with school that will benefit students, among others. PRDE's policy supports implementation of its Flexibility prioritizing the engagement of different parental groups by requiring parent committees and stakeholder advisory committees to include parents of special education students, as well as LSP students where applicable. As noted in PRDE's recent monitoring report, PRDE has made a significant effort in reaching out to the advocacy and parent communities for students with disabilities to ensure that these communities understand the principles of Flexibility.

During the 2013-14 school year, and in compliance with the **Boletin Administrativo Num OE -2013 057** and **Circular Letter #15 2013-2014**, school social workers were trained in strategies and activities to increase parental participation. This gave schools access to more parents and the opportunity to familiarize them with the Flexibility waiver and discuss their role in its implementation.

Accomplishments

- PRDE's increased emphasis on parental participation and policy implementation during the 2013-14 school year resulted in an increase in the percentage of parents visiting schools for feedback on their child's achievement. During the 2012-13 school year, parental visits to schools were between 10 and 30%. There was a significant increase in 2014-15. In August 2014, the participation rate was 76%, in January 2015, it rose to 82% and in March 2015 we made history with a 87% of parents visiting schools for receiving feedback on their child's achievement. The parents in the different media interviews expressed that they are recognizing that their engagements is important for their child's academic achievements. This increased participation has helped schools engage more parents in school processes, thereby facilitating Flexibility implementation.
- A Parent and Community Advisory Committee (PCAC), with island wide participation, was created to enhance parental and community engagement in Flexibility design and implementation. Currently, the committee consists of the parents of the students from the Secretary's Student Advisory Committee, which meets every two months. Two meetings have already been held to start the creation of the PCAC.

- A survey has been added to PRDE’s website to identify how much parents and community know about Flex and areas that need to be addressed. Based on feedback, PRDE develops strategies and promote activities to enhance engagement. Paper copies of the survey have been sent to Districts and schools to ease parental and community participation.

Current Activities

- Central Level staff members across all program areas have been tasked with reaching out to community members in order to integrate family and community engagement efforts into programmatic areas. Program areas are working to create materials and resources that help parents and the community support student learning. These resources will be broadly disseminated among parents and the community.
- Bi monthly meetings with the Parent and Community Advisory Committee (PCAC) and Student Advisory Committee meetings will continue. The agendas for these meetings will continue to include PRDE’s Flexibility Plan. PCAC participants will give recommendations and input on strategies and activities to increase parental and community involvement, gauge parents’ knowledge of Flex implementation and identify resources needed. Feedback received from the PCAC will be used by the Undersecretary of Academic Affairs to facilitate the design and implementation of activities for parents and the community, such as parent congresses, forums, focus groups, round tables, family days, open houses, etc.
- PRDE is updating the catalogs of parental workshops schools can offer to help parents support student learning and student achievement. The updates to these catalogs will be based on feedback received from parents during the most recent school year.

District Level

Each District must develop an action plans that include objectives related to parental and community engagement. In these plans, Districts outline how they will provide technical assistance to schools to improve Parental And Community Engagement and involve parents in implementation of activities described in PRDE’s Flexibility Plan. District staff also plan and implement activities for parents to help them understand school classifications and how schools can use resources.

Each month District staff members prepare a report describing parent engagement activities held during the month. This report includes a summary of feedback received from parents and community members. District staff members are also responsible for analyzing the feedback received from parents and the communities and giving input and recommendations to improve or enhance strategies and activities. These reports are sent to the Central Level to ensure that parent engagement activities are relevant and being implemented.

School Level

As indicated above, school directors are required to establish Parental And Community Engagement activities that are aligned with the PRDE’s public policy and Flexibility Plan. These activities are recorded in the school’s ***Authentic and Comprehensive School Plan (PCEA)***. Parent activities that are included in each school’s PCEA are based on the specific recommendation of parents and the planning committee. Required school level activities for parents and the community include: providing orientations to parents about school classification and interventions being implemented to address the

school's specific needs, working with social workers and counselors to gather feedback and recommendations on how to improve school level services, disseminating information and written materials and information on school services, school policy, the school's ***Authentic and Comprehensive School Plan (PCEA)*** at annual parent meetings.

At the school level, opportunities for parent engagement include participation in parent committees, school planning committees, community collaboration committees, participation in student progress day, parent meetings, workshops, and extracurricular school activities. School directors are required to submit a calendar of activities held with parents and summary reports on parental feedback to the District. Feedback is used to determine needs and improve engagement activities. As indicated above, a suggestion box is available for parents to provide feedback and suggestions.

Future efforts

In 2015-16 school year, a Family and Community Engagement Unit will be created at PRDE's Central Level. This office will be responsible for:

- Developing programs and projects that promote family and community engagement;
- Identifying and disseminating best practices on family engagement
- Creating teams to support family engagement projects and programs;
- Collaborating in the creation of community alliances;
- Aligning efforts of PRDE advisory committees and groups that include parents and community representatives, to increase active, meaningful participation and support Flex implementation; and
- Analyzing results of strategies and activities employed and making recommendations on necessary adjustments.
- Ensure each school creates a least one alliance to ensure the integration of the community into the school.

Social workers will play a significant role in following up on activities designed to engage and encourage parent and community members in implementation of PRDE's Flexibility Plan. The Central Level and Districts will continue use feedback gathered, surveys, and submitted reports to evaluate the effectiveness of Parent and Community Engagement efforts.

Parents and Advocates of Students with Disabilities

Accomplishments

This year, the Center for Special Education Services (*Centro de Servicios de Educación Especial, CSEE*), released information about the Flexibility Plan to parents islandwide. This strategy has been particularly effective because CSEE is already a resource that parents regularly use. At the Center, parents are given access to the document and can make recommendations or comments. Additionally, there were monthly parent meetings for those who visited CSEE. Parent feedback collected during these meetings was shared with the Office of Academic Affairs. Through the meetings, it was suggested and decided that meetings should occur every three months instead of monthly. In this upcoming year, PRDE will continue to have meetings every three months throughout the 2015-2016 year.

During the 2014-2015 school year, parents of special education students have given some feedback on the Flexibility Plan. This input was shared with the Undersecretary for Academic Affairs. Furthermore, PRDE program conducts monthly meetings with parents of special education students in all of the

CSEEs to share additional information about the Flexibility Plan implementation. Currently, over 178 parents have participated in these meetings. At these meetings, parents receive information and have the opportunity to ask questions and clarify any issues or concerns.

In addition to the meetings in the CCEE, the Associate Secretary of Education has been meeting with various groups of special education students' parents to share information about the Flexibility Plan. Specifically, there was a meeting between the Associate Secretary, the parents of the Committee of Special Education, and the APNI (Support for Parents of Disabled Children). The Secretary participates in meetings every three months with the Special Education Advisory Committee (CCEE). To date, there have been three meetings to discuss the implementation of the Flexibility Plan and its impact on the special education population. During a meeting, a review of upcoming and past activities by PRDE was presented. These activities are part of the stipulations of the Flexibility Plan and integrated into the work of the Advisory Committee. The Committee shared a validated report that reflects the input of the recommendations shared with the Undersecretary for Academic Affairs.

Current Engagement Efforts

The Associate Secretary for Special Education will continue to convene the CCEE and holds regular face-to-face ESEA Flexibility meetings with stakeholders. 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 is post notices informing families about ESEA Flexibility and requesting their input at each of the regional Special Education Service Centers. Feedback will also be collected via staff from 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. 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.

The Undersecretary of Academic Affairs will continue to participate in various forums and large group meetings in which leadership from the Special Education office and parent leaders from the special education population address stakeholder groups. These meetings are held in the community as well as in collaboration with institutions of higher education. The Undersecretary of Academic Affairs will maintain current staffing that assigns a specific representative to coordinate with the Special Education office.

Parents and Advocates of Limited Spanish Proficiency (LSP) Students

Between March 2014 and March 2015, the LSP program continuously notified parents of the program services with written material disseminated through regions, Districts, and schools in English and Spanish and includes information on Puerto Rico's Flexibility Plan. Through these written documents, parents were notified of their rights and provided with contact information including email, phone numbers, address of offices, and other staff who can help them to receive further information. They were also given opportunities to provide input and recommendations on the program services. Through this method, parents have contacted the program director for support and facilitation of

concerns and have provided input. Some regions have identified, a chairperson for the parent committee has been identified and names have been forwarded to the LSP director.

The LSP Advisory Committee and Parents Advisory Committee gives recommendations and provides input on strategies to engage parents. Workshops and orientations for parents address topics such as: 1) assessment results that determine student needs and services, 2) how parents can support learning in the home, and 3) results of student outcomes and other topics related to student progress.

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

Overview

Through the ESEA Flexibility Extension, PRDE will continue to implement rigorous plans to boost student achievement and improve educational outcomes for all students, paying special attention to students with disabilities and LSP students. The strategies outlined in PRDE’s original Flexibility request were implemented beginning in 2013 and continued during the 2014-2015 school year. Since the original approval of PRDE’s Flexibility Request, the system has realized critical improvements in various aspects of the school system. PRDE has implemented new approaches and public policies to improving student achievement, implementing innovative strategies to provide schools with customized services. As plans have been implemented for a full year, the effect of these efforts will be evident with the availability of the new high quality assessment to be administered in April of 2015. Also we have a new platform that delineate the different interventions per school classifications in the schools comprehensive plan and allows schools to receive a multilevel support and monitoring process.

PRDE’s continued implementation of ESEA Flexibility will provide continued focus on improving quality of instruction in Puerto Rico’s public education system. This will be achieved by using Flexibility implementation to ensure 1) alignment of teaching and learning in PRDE classrooms with college and career readiness goals, 2) providing differentiated supports to schools to improve academic achievement, and 3) establish the support and monitoring to accomplished the teacher and school director evaluation System. Approval of PRDE’s Flexibility extension request will allow the continuation of these ongoing efforts to meaningfully improve the quality of public education across the island.

PRDE’s implementation of ESEA Flexibility is consistent with the island’s policy goals for education. Both the Secretary of Education and the Governor have made public calls to continue efforts to implement rigorous, college and career ready standards, develop new and innovative instructional new strategies and customize the supports available to schools throughout our system of public education. An extension of PRDE’s Flexibility Plan will complement PRDE local education agenda.

PRDE’s implementation of Flexibility has focused the attention of leaders across the island on key reform areas and created new opportunities to engage stakeholders, specially the industry and the Institutions of High educations. PRDE’s commitment to providing students with high quality academic experiences, as expressed in its Flexibility plan, has created a spirit of collaboration among stakeholders and helped focus attention on preparing world-class college and career ready students. As a result, the public education system has benefitted from stakeholders’ contributions of new perspectives, ideas, and strategies to reform the system. Continued implementation of the ideas included in PRDE’s Flexibility Plan will allow these meaningful conversations to continue.

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 revision initiative is an effort to improve the quality of education across the island. PRDE’s new standards include grade-specific content expectations for all students and include the use of curriculum maps with unit content and activities for instructional purposes. PRDE has developed scope and sequence calendars to help teachers make informed

instructional planning decisions. These tools help teachers, school directors and District staff keep track of the scope and sequence at the classroom level. PRDE has also incorporated into its new curricular and instructional materials additional resources to promote greater differentiation of instruction. The renewal of ESEA Flexibility will enable PRDE to continue to utilize these resources and focus its attention on strategies for enhancing teachers' capacity to ensure all students can access the standards.

PRDE is proud of its successful efforts to implement a weekly planning template for teachers. This was put into place in 2014 and teachers report it has improved their ability to develop effective daily plans based on the new curricular units. District staff also report these tools have improved the quality of instruction at the classroom level. District level staff members, such as academic facilitators, are assigned to schools to provide support or technical assistance to teachers. PRDE's Central Level staff uses these tools to ensure that the delivery of instruction across all our classrooms is aligned with the new standards and that teachers are maintaining an appropriate pace for instructional delivery. Central and District level oversight of instruction is captured through the use of a new online platform, SAMA, which is described in detail under Principle 4.

Implementation of Principle 2 is consistent with PRDE's ongoing efforts to implement a differentiated accountability system. PRDE remains committed to pursuing the new ambitious AMOs it set in its original Flexibility application. Flexibility's requirement to focus on the specific learning needs of students has led PRDE to place new focus on the use of data to inform instructional decision making. Ongoing analysis of student achievement data has led to a more complete and accurate understanding of students' and schools' instructional support needs. In addition there has been organizational changes at PRDE's Central Level to better align the work of Office of Academic Affairs and the Planning and Accountability Office.

As described above, PRDE has created an online platform to support the development of each school's **Authentic and Comprehensive School Plan (PCEA)**. This platform clearly delineates specific interventions for schools based on their classifications under Flexibility. Over the last two years, District level staff have provided ongoing support in data analysis through the provision of school-level workshops. School directors and teachers have requested additional support to be able to develop interventions aligned with their specific needs. Since January 2014, District and Central Level staff have designed and delivered supports based on each school's classification. PRDE has also provided strategic and differentiated support to remaining non-categorized Title I schools (which PRDE has named Transition schools).

It also supports school and District level staff efforts to implement these strategies and track progress. PRDE developed and uses SAMA to enable Central and District level to provide oversight and feedback to schools as they implement their plan. PRDE's Central Level also holds monthly meetings with District level staff to assess progress, identify support needs and provide ongoing technical assistance to ensure all schools within a District are met.

PRDE's implementation of Principle 3 reflects its continued commitment to implementing an effective educator evaluation process. The development and implementation of a formal educator evaluation and support system process represents a significant change for Puerto Rico. This type of formal evaluation and support system, while permissible under existing law, had not been consistently implemented across the island. Over the past four years, PRDE has taken great effort to ensure its educator evaluation system uses a formal, objective and robust tool. PRDE's new approach is focused on recognizing and enhances

educators' strengths and also identifies those areas where support is needed. PRDE recognizes that the implementation of an effective educator evaluation and support system is necessary in order to make significant improvements in the quality of teaching and learning in its schools. By monitoring and reinforcing professional standards for the delivery of content and the use of instructional practices, PRDE's implementation of Principle 3 supports and advances its efforts under Principles 1 and 2.

PRDE's ongoing implementation of Principle 4 reflects its commitment to reducing the administrative burdens inflicted on our Districts and schools. Key examples of the reduction of administrative burden include the creation of SAMA, the revision of the Professional Services Contracting process and the administrative reorganization of the entire PRDE. Additional detail on these matters is provided in Principal 4.

Accomplishments 2013 - 2015

Principle 1: PRDE implemented new academic content standards, called the Puerto Rico Core Standards, in the 2013-2014 school year. PRDE's curriculum, content standards and grade level expectation are aligned with the Common Core Standards (CCS) and the fundamental ideas of Career and College Readiness (CCR).

PRDE provided training on the PRCS and the use of curriculum tools from summer of 2014. This training has been continued in the current school year. Training sessions are provided across the island, at the District and school levels. PRDE also created Professional Learning Communities (PLC) to facilitate the dissemination of information about the new standards. PLC meetings were also used as professional development opportunities through which educators could become familiar with the new standards. PRDE educators received an overview of the resources that were created to support the implementation of the PRCS and information about how to use these resources and instructional materials. PLCs also addressed the instruction and supports appropriate for use with students with disabilities and LSP students.

Additional accomplishments related to implementation of the PRCS and statewide assessments include:

- Disseminated of quality materials and teacher resources and posted on the Puerto Rico Department of Education webpage.
- Held island-wide monthly content area Facilitators meetings and content area workshops.
- Developed a new high quality assessment and alternate assessment aligned with new standards
- Executed planned PRCS 2014 assessment activities related to Item back revisions, continued item writing, range finding process among others).
- Issued a new RFP to allow for a new statewide assessment in 2016, consistent with the high quality plan PRDE included in its first Flexibility application.
- Held various trainings to build teacher capacity to administer the alternate assessment, ensuring the needs of new teachers and experienced teachers were addressed
- Provided training and oversight to ensure high quality implementation of Alternate Assessment under Portfolio strategy for the student with significant cognitive impairments based on new standards revisions

- Signed an official Memorandum of Understanding with World-Class Instruction, Design and Assessment (WIDA) in order to adopt the WIDA standards for Spanish limited students for PR classroom implementation based on a final crosswalk alignment.
- Provided training to teachers and other academic personnel with WIDA training

Principle 2: Currently, PRDE has 72 priority schools, 146 focus schools, 92 reward schools, and 1,057 transition schools (originally identified as no category) and 19 schools that do not receive Title 1 Part A funds. Priority and focus classifications will be revised in May 2017. To address the needs of all schools based on their classification PRDE developed the ***Authentic and Comprehensive School Plan (PCEA)*** and created a system to ensure that the intervention strategies for each category of schools: priority, focus, and other Title I schools were aligned with schools' specific needs. The new platform supports the implementation of PRDE's content standards, curriculum maps, and recommended instructional strategies. The new platform also ensures schools include interventions to address the needs of LSP and special education students. Central Level and District staff have developed new strategies for ensuring that school staff is utilizing data to make instructional decisions and plans. The Statistics Unit provides direct support to schools on the data that led to the school to its current classification and Academic Facilitators help teachers develop the best interventions that address these academic needs. In support of Principle 2, PRDE is continuing to develop a defined and clearly articulated instructional model for educating of "at-risk" populations, including students with disabilities, LSP, high poverty/mobility, and credit-deficient students.

Additional accomplishments related to the providing schools with customized support include:

- Communicating the classification of all schools
- Developing aligned supports and intervention strategies based on the school classifications
- Reclassification of reward schools based on 2013-2014 achievement data
- Publicly recognizing and providing economic incentives to reward schools
- Developing of professional development workshops to train teachers on how to use existing curricular supports and better differentiate instruction
- Developing data sharing tools that includes ways to view data in a variety of ways that can inform teachers' planning and instruction
- Initiating of the Puerto Rico's School and State Report Card redesign based on mandatory elements for public dissemination

Principle 3

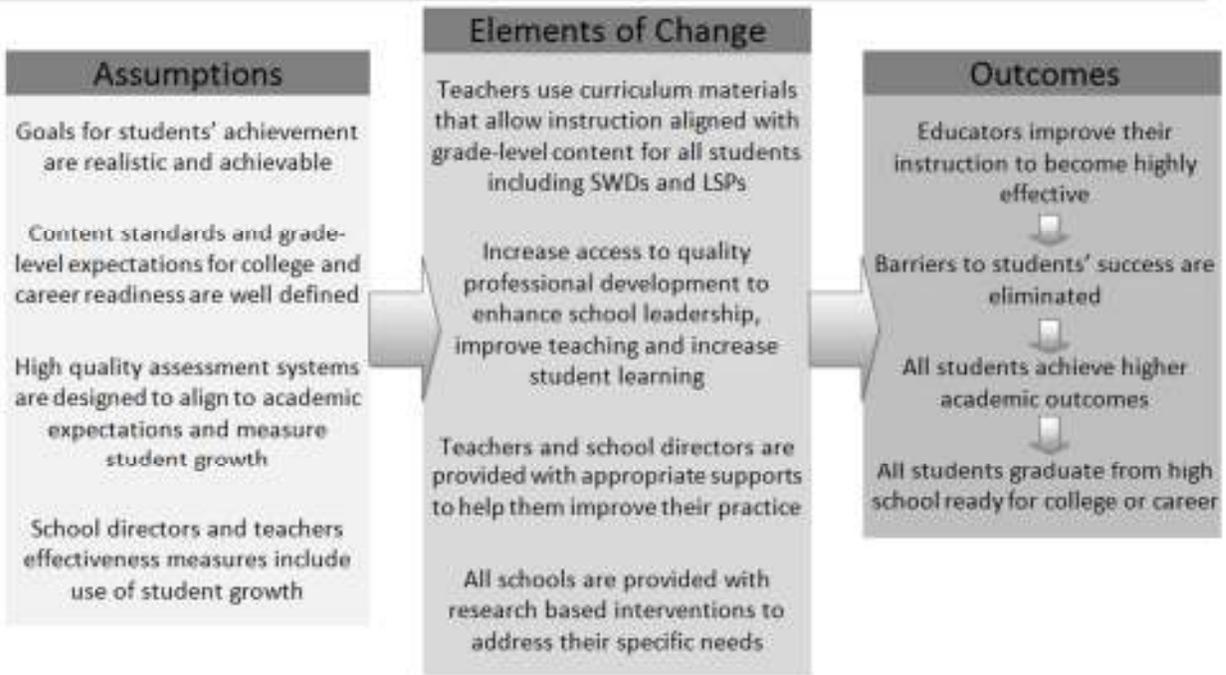
PRDE's commitment to increasing teacher effectiveness through the development and implementation of a system-wide teacher and school director observation and evaluation tool and process. This process improves teacher effectiveness as observation and evaluation data offer information to support individual growth plans and other human resources decisions to ensure effective teaching is happening in every classroom across the island. The evaluation model, evaluation process, and all related tools have been developed and vetted throughout the system through field testing, feedback and focus groups.

Additional accomplishments related to the educator evaluation systems include:

- Revising and improving educator evaluation rubrics and evaluation criteria

- Implementing evaluations in 282 pilot schools in 2014-2015
- Conducting meetings with stakeholders to share information and garner input and recommendations on the related tools
- Developing Guidelines and implementation tools/manuals
- Revising Principle 3 to address Peer Review comments
- Collecting and incorporating feedback from various stakeholder groups
- Revising the evaluation cycle to reflect lessons learned and user feedback

PRDE’s Theory of Action regarding its ESEA Flexibility Extension request is presented below. PRDE believes this diagram 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. It also 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.



Context for Puerto Rico’s Flexibility Request

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. The Puerto Rico Department of Education (PRDE) is a unitary system serving as both the state educational agency (SEA) and a single local education agency (LEA). The PRDE oversees one island-wide education system comprising 1,386 public schools serving more than 410,950 students from kindergarten through grade 12 and employing 31,136 teachers. For administrative purposes, the PRDE divides the geographic area of Puerto Rico into seven regions and 28 school Districts.

PRDE executes the responsibilities of both an SEA and an LEA. From the SEA perspective, PRDE’s Central Level develops policies and guidelines, provides materials and technical assistance, engages in oversight and monitoring and provides leadership to all schools and Districts. From the LEA perspective, PRDE provides direct services to schools and ensures the implementation of SEA level policies.

The Central Level consists of two main Undersecretary offices: one for academic affairs and one for administrative affairs. The Associate Secretary of Special Education handles all matters related to students with disabilities including administration, technical assistance, transition services, transportation, and equitable services among other specific services to students with disabilities and their families.

A Region is a functional unit of the PRDE that executes the policies and procedures of the Undersecretary of Administration. Regional directors are responsible for organizing training programs for school administrative personnel related to budget, school staff management, fiscal audits, and purchasing procedures. They also coordinate transportation services; organize academic, recreational, and cultural activities for schools; and manage professional services for students with disabilities. Regions are also responsible for providing support to resolve administrative issues in schools and 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.

Districts: Although PRDE uses the term “Districts,” these entities are not independent local educational agencies (LEAs). These Districts do not have autonomous decision-making authority, nor do they have fiscal independence.

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. 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.

The academic District is going through a redesign to ensure consistency in resources across the 28 Districts and greater academic support for the strategies laid out in our Flexibility program. The new key roles in the District are the following:

- District Special Assistant ("Ayudante Especial de Distrito") report to the office of the Undersecretary of Academic Affairs at the Central Level, in coordination with the Undersecretary Special Aids. Their responsibilities include developing a management plan to ensure the timely delivery of academic services to Schools.
- The Superintendents of Academic Support report to the District Special Assistant. Their responsibilities include guiding the implementation of curriculum instruction and assessment and leading the design of intervention plans by facilitators (differentiated interventions by type of School) and ensuring its implementation.
- The Superintendents of Evaluation, Compliance and Technical Support for School Principals report to the District Special Assistant. Their responsibilities include offering technical assistance for School Principals, running evaluation process for School Principals and supporting Principals in the evaluation process for School Teachers.
- Academic Facilitators report to the Academic Support Superintendents. Their responsibilities include serving as instructional leaders, coaches for teachers, and facilitating professional development on curriculum and instructional strategies. Academic Facilitators also provide support helping schools customize their programs to meet the needs of students in the school, including talented students, low-achieving students, students at-risk of dropping out, and special education and LSP students.
- Parent Coordinators report to District Special Assistant Their responsibilities include overseeing the Committee for Parents, whose role is to provide technical assistance to parents, coordinate workshops, and encourage parental involvement in the school community.

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.

Student Population

During the 2012-2013 school year, approximately 434,609 students were enrolled in Puerto Rico's public schools. These public school students account for approximately 74% of the island's total population of students in grades PK-12 while 26% of Puerto Rico's students attend private schools (Consejo Superior de Educación de Puerto Rico, 2013). The population of students who attend public versus private schools has significant demographic patterns related to socio-economic status and disability classification.

PRDE's public school population is fairly homogenous; less than 3.18% of the student population consists of ethnicities other than Puerto Rican (Hispanic, non-Puerto Rican 1.84%; American Indian/Alaskan Native 0.12%; White, non-Hispanic 0.13%; Black/African American 0.02%; 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 28.9% of all students in our public school system have been identified as students with disabilities. 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 1961 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.

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 are:

- 1) History of slow changes in academic achievement
- 2) Reporting and use of data and data driven instructional practices
- 3) Maintaining collaboration with teacher representative organizations
- 4) Puerto Rico's Commonwealth Financial crisis
- 5) School directors and teachers retentions

History Of Slow Changes In Academic Achievement

Challenge: For the 2012-2013 school year, a total of 1,321 (91%) schools were categorized as needing improvement under ESEA. Prior to Puerto Rico's initial implementation of ESEA Flexibility, all but 151 PRDE's public schools were identified as "in need of improvement" under NCLB. PRDE's original Flexibility request allowed PRDE to fundamentally change the identification and responses to academic achievement challenges. Under Flexibility, PRDE has been able to direct critical funds to the students that need the most assistance. However, PRDE realizes it will take longer than one year to fundamentally shift the achievement levels of students in Puerto Rico's schools. PRDE has a history of slow change in terms of academic achievement and it presents a challenge to the overall progress

of the school system. Implementation of ESEA Flexibility represents a fundamental change to how schools, teachers, directors, and District staff have approached school improvement initiatives that lead to academic achievement.

Response to Challenge To address this challenge, PRDE will continue to implement the strategies outlined in its Flexibility Plan. The consistent and continuous implementation of the strategies defined in each Principal will enable PRDE to solidify the new approaches to school improvement it has adopted. PRDE will continue to disseminate information about its new approach to addressing schools' and students' learning needs. It will continue to develop communication and training materials that ensure all stakeholder groups are aware of the new interventions, approaches and services available to PRDE schools. PRDE will continue to promote the new planning and instructional practices it has introduced in the last year. There will be ongoing support and the development of new curricular materials to ensure the needs of diverse learners are met. Additionally, PRDE will continue to provide continued and sustained professional development to improve the competencies of educators throughout its system.

Reporting And Use Of Data And Data Driven Instructional Practices

Challenge: A second challenge for PRDE is the use of technology to access and effectively capture quality data that can inform instruction. Developing online tools such as dashboards have proven effective; however, the full and meaningful implementation of these tools system wide will take time. The use of these tools to inform instructional planning represents significant change in practice for PRDE educators.

For the past three years, PRDE has used data dashboards to support ongoing data collection and tracking of student progress toward academic achievement and attainment of operational and climate goals for SIG schools. Through the use of dashboards among SIG schools, PRDE has grown the internal capacity of teachers and school directors' to use data. The use of dashboards in SIG schools provided an opportunity to monitor and report student performance at the school and District levels. Given to the effectiveness of the use of technology dashboards practices in SIG schools, PRDE expanded implementation of dashboards into all schools.

In the past two years, PRDE created new training programs to help teachers and administrators use dashboards. For SIG schools, dashboard trainings were held 1) before the school year begins, 2) during the creation of school plans, 3) and at professional development meetings. Training for other schools, have focused on the development of 1) school level PCEAs and or 2) action plans. The Office of the Undersecretary of Academic Affairs provides the content for these trainings and the Office of Planning develops the training materials. The trainings are implemented and supported by District level staff and external providers to maximize the number of people trained.

Response to Challenge: To ensure full implementation of dashboards, PRDE will continue to provide training and support necessary to ensure educators at all of the schools have the capacity to use these tools to identify the academic needs of all students including subgroups. This training will support the use of assessment data to track student progress for personnel at the school and District levels (i.e. teachers, directors, Superintendents, Assistant Superintendents). The trainings will also

help teachers learn and understand how to identify and support the academic needs of students with a focus on Flex waiver principles, including diverse learners, not making progress toward academic standards.

PRDE will need to find a way to allocate sufficient time for training in the use of data analysis tools while it also engaged in comprehensive professional development to support new standards and educator evaluation supports. PRDE recognizes it will take time to create a culture of instructional decision making that results in interventions that are based on the analysis of achievement data and as they relate to academic goals.

Challenge: Another challenge PRDE faces is the absence of a fully operational State Longitudinal Data System (SLDS). PRDE’s SLDS grant was intended to 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). The objectives of this effort is to 1) effectively implement the K-12 portion of what shall be Puerto Rico’s full-fledged statewide longitudinal data system; 2) establish and perpetuate an effective K-12 data governance and quality function that proactively guarantees the reliability of information; and 3) uniformly instills an information-based education performance management culture with stakeholders.

PRDE’s SLDS has a reporting dashboard that is operational. SLDS has a reporting tool (Smart and ad-hoc) and a dashboard to present student longitudinal data and other related data analysis for decision making that will also be available after the project has been implemented. It is in the evaluation process to improve data presentation layers and content according to audience needs.

Response to Challenge: The IT Department will work to develop and disseminate tools such as online trainings, manuals and procedures, videos and other interactive online materials to supplement workshops related to the use of the SLDS. These tools will assist in the implementation of the SLDS user trainings process and in the acceleration of the user adoption. PRDE will continue to develop educational content that benefits teachers, District, regional, central offices, parents, government agencies and the community.

PRDE is establishing an organizational structure that will establish processes to achieve a culture of data analysis (correct, complete, and updated) in order to make decisions. Additionally, it is formalizing its data governance processes which will provide structure and established the responsibility of each program area to improve the quality of the data in a continuous and collaborative manner. PRDE will also create a policy that outlines responsibilities, roles, and procedures for obtaining, reporting, and using the data. The PRDE is aggressively working with the revision of data management policies and implementing data governance practices to ensure that the data being used is of high quality and reliable for use in decision making related to academic achievement.

Maintaining Collaboration With Teacher Representative Organizations

Challenge: There are five primary teacher organizations in Puerto Rico (the *Federación de Maestros*, the *Asociación de Maestros, Únete, Educamos*, and *Educadores Puertorriqueños en Acción*), and two school director organizations (*Organización Nacional de Directores de Escuela de Puerto Rico* and *Educadores Puertorriqueños en Acción*). Some of the organizations have been decertified and cannot legally represent teachers in collective bargaining activities. However, they consistently give opinions on PRDE policy, strategies and procedures that mostly differ from PRDE’s objectives, preventing smooth implementation and sometimes causing disengagement on the part of educators.

Response: The Secretary of Education will continue to hold meetings with representatives of these Organizations and provide forums in which they can express concerns and engage in a collaborative planning and decision making. The Secretary will also continue to document and respond to issues they raise, validating their concerns and providing additional information to promote a participative, constructive conversation. These groups will also be given the opportunity to give feedback and recommendations on new policy before it is issued. PRDE believes this will generate more receptiveness and openness to PRDE policy aligned with its Flexibility plan. Should teachers and school directors that are not included in the Secretary’s Advisory Committee request to participate in meetings with these Associations, they will be permitted to do so.

Financial Crisis

Challenge: PRDE is delivering education services in the economic context of a highly indebted public sector that has severe liquidity problems. Similar to what is happening in many states, The official public debt burden is over \$73 billion with additional unfunded pension and healthcare liabilities. Government officials at OMB have been targeting a balanced budget for fiscal year 2015; a goal that has not been achieved in Puerto Rico in several years. A high proportion of Puerto Rico’s budget is dedicated to debt service. In addition, the Government Development Bank (GDB), the government bond issuer, is facing recapitalization challenges again. The economy is also affected by a decreasing population (Puerto Ricans are constantly moving to mainland US) and a high unemployment rate (over 14%).

This struggling environment is also increasing budgetary pressures on the Education System. The assigned budget by OMB of around \$3.3 billion for fiscal year 2015 will very likely be reduced for next fiscal year. The Commonwealth of Puerto Rico General Fund has been strongly impacted by a slow economic growth resulting from the economic recession over the past nine years. The General Fund Revenues continue to diminish while commitments and obligations for debt service, retirement systems contributions and basic services to constituents keep an increasing pace. The effects of this financial crisis has impacted PRDE’s General Fund appropriations. For fiscal year 2014-2015, the General Fund appropriations for PRDE amount to \$2,117,323,000 reflecting an 11.79% decrease from fiscal year 2013-2014 which had amounted to \$2,400,263,000. This decreasing trend is expected to continue thru fiscal year 2015-2016.

Response to Challenge: In this challenging environment, within our mean the government is pursuing different turnaround strategies to ensure a successful education system.

Presently, the Governor of Puerto Rico, Hon. Alejandro García Padilla, proposed legislation to transform the Commonwealth’s tax system and its structure from mainly relying on income tax revenues to a heavier reliance on a tax value-added tax. The proposed legislation is undergoing

legislative review and analysis and changes are expected prior to approval with a phased implementation running from July 2015 thru 2016.

**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. Additionally, explain how this transition plan will lead to all students, including English Learners, students with disabilities, and low-achieving students, learning and gaining access to content aligned with such standards. The Department encourages an SEA plan either to include 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.

Status of New PRDE Core Standards

In the 2014-2015 school year, PRDE implemented its new standards. PRDE developed these standards (PRCS) with the input of PRDE's IHE, business community, and K-12 educator stakeholders. These standards align with the concepts of college and career readiness for students in Puerto Rico. PRDE developed supporting curriculum materials for grades K-12 for Spanish, mathematics, sciences and English as a second language using curriculum maps, support standards-based instruction and the professional development of teachers. In 2014, the University of Puerto Rico certified that high school students who master PRDE's rigorous standards will not require remedial coursework once in college. All other IHEs in Puerto Rico also assessed the alignment between our curriculum and standards and confirmed that they provide students with the knowledge and skills our high school graduates need to succeed during their first year of college.

The mission of the PRDE is to ensure that all students master the standards, demonstrate proficiency and develop the necessary skills and abilities to be successful in a post-secondary environment and or in the workforce. The curricula's vertical and horizontal alignment make it possible for teachers to include cross-curricular activities that enhance 21st century learning. The implementation of the new PRCS helps ensure PRDE students will be college and career ready.

This past summer, school directors and academic facilitators received training for additional academic strategies to enhance the capacity to implement the new PRCS. Topics addressed during the summer sessions included: 1) how to plan lessons using curriculum maps and planning strategies, 2) how to successfully differentiate instruction, and 3) how to best use the curriculum maps and scope and sequence documents. The training will be provided annually in the summer. Throughout the school year, PRDE provided seminars to all teachers and school directors in all of the 28 school Districts to support ongoing implementation of the new standard. These trainings focused on effective use of curricular materials and new curriculum maps.

In the past two years, PRDE developed the following tools to implement its curriculum:

- Policy documents
- Curriculum sequence calendars and curricular maps for grades 4th – 8th including all components of the curriculum Vertical Alignment, Scope and Sequence of Content per grade and class (K-12)
- Instructional resources that promote the use of best practices and those with scientifically based evidence effectively differentiated instruction
- Weekly Planning Guides and daily instructional plans
- Websites to disseminate access to standards and planning materials for teachers
- FAQ and training documents to support educators efforts to understand and implement the new standards
- The creation of an online system, SAMA, to monitor the implementation of all activities related to Principle 1. The description of SAMA appears in Principle 4.

When PRDE developed the curricular and instructional materials to support the implementation of its new standards, it also included integrated assessments for each grade level. The implementation of

these new standards in the 2014-2015 school year has required significant effort and PRDE has focused all available resources on assisting teachers to 1) understand the new content and 2) understand how to engage in effective instructional planning. To effectively address these two areas of focus have required the full allocation of PRDE's existing resources at the Central and District levels. For this reason, PRDE has not been able to work with teachers on ensuring they understand the design of the integrated assessment and can use these effectively in their classrooms. PRDE will focus its attention on implementation of the integrated assessments in 2015-2016.

Professional Development

PRDE has developed a comprehensive strategy to ensure teachers have the support they need to fully implement the new standards and provide high quality standards-based instruction. PRDE's Professional Development Institute is responsible for overseeing professional development to support island-wide initiatives. This office provides as many resources as possible that help schools and teachers respond to students' learning needs.

Central Level creates a master calendar that outlines planned, island-wide professional development activities. Additional professional development is provided by the District level staff in various formats including workshops, large group trainings, job embedded professional development, and coaching in the classroom. Schools can request additional training throughout the course of the school year. This Each school can make customized selections of additional services and resources that best align with identified learning needs. Schools identified as priority for professional development can request additional support and professional development as needed.

Currently, schools document professional development to support the implementation of the new standards in their PCEA. PCEAs are reviewed by District staff to ensure that planned professional development addresses the implementation of the new content standards and reflects school-specific needs. District level staff are responsible for ensuring that teachers and school directors consider the challenges associated with implementing the new curriculum and 1) results from the state assessment, 2) the needs of particular subgroups, and 3) the interventions aligned with each school classification when planning professional development activities.

Districts must demonstrate they are focusing local resources on providing assistance to support teachers in the full implementation of PRDE's new standards and rigorous classroom instruction. Each school District prepares professional development calendars that specify when District staff will visit schools, teachers and directors. Academic support provided by the District staff is intended to be ongoing and its delivery is consistent yet differentiated based on the schools' specific needs or focus. This District level support is provided through job embedded technical assistance, coaching, mentoring, demonstrations, observations and feedback.

PRDE also promotes the implementation of its new standards through the use of Professional Learning Communities (PLCs). PRDE's vision for a PLC is to have a regularly occurring opportunity for teachers to work together and share their experiences, lessons learned, and successful practices with each other and other schools within their Districts to build their knowledge and the knowledge of others.

In the last fiscal year, PRDE did not have sufficient funds to support the development of online demonstration classes. However, we are currently finalizing professional development videos that will

be available to teachers through the PRDE website. These videos outline best practices related to: planning, how to use curriculum maps to develop performance tasks, and data driven decision making. Additionally, if feasible, PRDE will work to develop additional online resources that support these professional development areas and make it possible for teachers to access on demand.

Accomplishments

- Created the Puerto Rico Content Standards in math, English, Spanish, science.
- Created a core group of trainers and technical assistance supports for other instructional staff.
- Created and implemented a train-the-trainer program for Academic Facilitators on differentiated instruction.
- Created a workshop for teachers on how to adapt curriculum and select effective research-based practices.
- Provided training for Academic Facilitators regarding best practices for academic planning and using instructional planning models and curricular maps
- Designed a guide for each core subject to ensure rigorous and effective implementation of the standards.

Current Activities-2014-2015

- Provide ongoing professional development to support the implementation of the content standards to ensure teachers: 1) understand how the standards are articulated across grade levels and subject areas, 2) understand how to leverage student learning at key transition points and ways that close gaps and eliminate duplication, 3) know how to use instructional materials that are aligned with PRDE's standards
- Ensure that instructional materials are not limited to textbooks and promote the use of instructional practices that are research-based and consistently implemented within each grade level and content area.
- Continue offering at the District level on-site professional development to teachers using various modalities which include classroom demonstrations, mentoring, coaching, teacher meetings to discuss concerns, providing materials, sharing best practices, direct observations, and providing feedback to ensure a quality implementation of the standards.
- Continue offering at the school level onsite training regarding use of curriculum tools, vertical and horizontal teaching, and scope and sequence of content per grade and class (K-12) and 2) technical assistance to ensure teachers and directors understand the content and requirements of the new standards as set forth in PRDE's policy documents (Circular Letters).
- Continue implementation of the professional development program for new educators related to the use of curricular materials, planning strategies, differentiated instructional strategies, and assessments for effective classroom instruction. This program is repeated regularly for new educators.

Future Efforts:

For the next two years, PRDE will continue to use different professional development strategies to support Principle 1 (see exhibit 1 of Principle 3). During the school years and summers, PRDE will provide training to teachers and school directors on academic content to support professional growth and classroom management. The themes will be selected based on the analysis of professional

development needs, Academic Facilitator classroom visits, and results of the statewide assessments. Additionally, it will include scientific based best practices, differentiated instruction, curriculum materials, learning communities, and integrating technology into students' learning process. PRDE expects that as a result of the professional development activities and the use of curriculum materials aligned to standards and grade level expectations, teachers will improve classroom instruction and help all students achieve higher academic outcomes.

Additional Supports for Teachers of Students with Disabilities to Ensure Implementation of the New Standards

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

PRDE sets high expectations for the performance from students with significant cognitive disabilities (approximately 1%) and makes certain the curriculum is based on the same content standards as their same grade peers. PRDE's alternate achievement standards reflect rigorous content of the knowledge and skills that students with significant cognitive disabilities must demonstrate to be considered proficient in the academic domains for each grade level.

Accomplishments September 2013 – March 2014:

- PRDE's curricula includes methods of differentiating instruction for students with disabilities. PRDE's curricular maps establish performance tasks with alternative strategies for teachers to use with students with disabilities. PRDE has only one curriculum for each content area and that curriculum applies to all students including students with disabilities. 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.
- Considering the specific needs of the autism population, the Associate Secretary for Special Education integrated the STAR curricula in the summer of 2014. In that month, the Secretary established a collaborative agreement with the Center for Integral Stimulation, integrating diverse academic sectors into education. STAR is a specialized curricula for students with autism that combines standards need areas and student needs. The STAR curricula is based in ABA, TEACCH, PECS, and other strategies. It is aligned with the federal Common Core State Standards (CCSS). The elementary STAR program includes detailed lessons plans, didactic materials, data systems and an evaluation based on the study plan in the six curricular areas: receptive language, expressive language, spontaneous language, functional routines, academics, play, and social abilities. The Links intermediate level program promotes the students' independence in natural environments. The Links online system uses an evaluation based on the curriculum of individualized routines for each student. The Links school and community plans provide the teacher the necessary tools to effectively teach individual abilities and independence of daily routines.
- In summer of 2014, training was held for 40 officials that serve students with autism. Full-time special education teachers of autism (preschool, elementary, intermediate, and secondary, service assistants, school directors, and special education academic facilitators and specialists

from the Mayagüez, Ponce, San Juan y Bayamón region) participated. During the training, they were trained and provided with basic materials for the teachers to use in the classrooms. The participating schools in this project are the majority of the Transition schools.

Current Efforts:

- Special education Teachers receive direct support for academic content and instructional strategies from the Special Education Academic Facilitators. Regional, School District Units, and the Associate Secretary for Special Education monitor the special education program in schools to ensure compliance of the special education regulation including supporting the educational, social and emotional needs of special education students.
- In January 2015, as part of the STAR curricula implementation, professional development training was offered to the teachers that were selected to work on the project. Additionally, four certified external specialists acted as local coaches by supporting teachers with the trainer from the U.S. The SAE project continues extending the project to other regions and schools. In addition, the curriculum is being translated to Spanish for ease of use with a large group of teachers. A “train the trainer” model is used so that all teachers currently participating in the project can train other special education teachers in August 2015. The trainings will be ongoing until full implementation of the curriculum in all DoE autism classrooms. In the current phase, the PRDE is translating and revising the lessons and basic materials to meet the needs of students and teachers in the DoE. The next phase of the project will be the translation of the curricula, aligning of the curricular to the PR standards, and implementation in more schools.
- Teachers working with students with disabilities 16 years and older are provided annual training in the transition to adult living process. 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, parents/guardian, regular and special education teachers, school director, social worker and a representative of the Vocational Rehabilitation Program to jointly develop an individualized educational plan (IEP). The IEP takes into consideration the student’s psychological and impairment evaluations and the results of the Vocational Interest Inventory administered by the school counselor. Students deemed eligible are 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 align them to contemporary challenges facing today’s students.

Additional Supports for Teachers of Limited Spanish Proficient Ensure Implementation of the New Standards

Summary of Population

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) students is the group of student in Puerto Rico that is not fluent or is limited in the Spanish language in reading, writing, and listening and parallels the English language learner (ELL) group in mainland states. As of March of 2015, there are 1,961 identified LSP students being provided services in Puerto Rico. These students are served through the Title III program. It is PRDE’s expectation that the LSP population achieves the same academic goals and standards as regular students while becoming proficient in the Spanish language.

In 2013-2014 and beginning of 2015 the LSP Program provided 14 professional development capacity-building activities related to Civil Rights of LSP students; using SIE and MIE identification systems; LSP students and students with disabilities; administering and analysis of screener and annual test; differentiated instruction; statistical data; evaluating classroom educational supports; instructional strategies: scientific based learning theories; teaching and learning processes; technology resources; supplementary instructional materials; trainings on WIDA standards; October 2015 procedures manual; parental notification and program's public policy and flex plan alignment. Academic facilitators, teachers, support personnel (social workers and counselors), school directors, and new and other administrative staff that offer services to identified LSP students from the 28 Districts participated. PRDE expects that as a result of the 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. Professional development activities highlight aspects of the curriculum so that all classroom teacher have a repertoire of tools for adjusting standards-based instruction to address LSP student's needs.

On a yearly basis, LSP teachers complete a needs assessment where they give input on areas and topics for further support. Professional development activities are specifically tailored to teachers' needs, as well as curriculum implementation, differentiated instruction, research based instruction, Title III regulations, school and Individual Work Plans for participating students, and other topics identified by District and Central Level support staff.

Accomplishments September 2013 – March 2014:

- In August of 2014 the circular letter for the LSP program was revised and presented to stakeholders through the department's website and orientations across the island including private schools. An LSP procedural manual (Manual de Procedimiento para program LSP y Emigrantes) was created in order to establish public policy regarding providing services to LSP students in Puerto Rico. Spanish program directors presented the procedural manual draft in their monthly meeting with Spanish academic facilitators in order to obtain feedback on the document.
- In 2014 PRDE aligned the LSP curriculum to the World-class Instructional Design and Assessment (WIDA) standards that are developed to facilitate the alignment of PRDE standards for LSP students. The PRDE curriculum and curricular maps for grade levels and subjects include research-based strategies for differentiated instruction with LSP students to improve the quality of instruction in the development of the socio-linguistic skills of the Spanish language. PRDE developed curricular maps for performance tasks with alternative strategies for teachers to use with LSP students. These strategies focus on the particular needs of the LSP student population. These strategies include differentiated instruction, reciprocal instruction (cooperative and peer-learning strategies), library as a reading and investigative center and classroom as a learning lab. PRDE signed an official Memorandum of Understanding with World-Class Instruction, Design and Assessment (WIDA) in order to adopt the WIDA standards for Spanish limited students for PR classroom implementation based on a final crosswalk alignment. PRDE also provided training to teachers and other academic personnel with WIDA training.

- In 2014, PRDE LSP program contracted external provider to conduct an evaluation of the LSP students with a proficiency test. Monthly meetings have been held with McGraw Hill to organize the two phases (screener and proficiency results) of the student evaluations and to follow up on the results to determine which students are continuing or exiting to the regular classroom as former LSP students. A proficiency level report for all LSP students will be received in March 2015 detailing the data for all LSP students.
- Instructional material, technology, translators, and program materials were purchased and distributed to all 28 Districts across the island who are providing services to the LSP students. The verification of the delivery and receipt of the materials was ensured by using a delivery receipt form that was submitted to the director of LSP at the Central Level.
- Two Critical model trainings were provided to all 28 Districts. The training consisted of how to address student learning needs during study sessions at home. In addition, the training resources discussed the different intelligences theories and how to improve the supporting practices based on student learning capacities. The main purposes of these workshops were to train parents on how to become active participants in assisting LSP students after school.

Current

- In first semester of 2015 monitoring visits were conducted to verify the services provided to LSP students in several regions including Caguas, Ponce, Humacao, and San Juan. In addition, an external evaluator chose a sample of schools from Ponce, San Juan, and Mayaguez and will provide them with external monitoring of the LSP program and services.
- March 2014 to March 2015 the LSP program notified parents of the program services with written material disseminated through regions, Districts, and schools in English and Spanish and includes information on the Flexibility Plan for Puerto Rico. Through these written documents, parents are notified of their rights and contact information including email, phone numbers, address of offices, and other staff who can help them to receive further information. They were also given opportunities to provide for input and recommendation of the program services. Through this method, 20 parents have contacted the program director for support and facilitation of concerns and have provided input. In the Mayaguez and Ponce regions, a chairperson for the parent committee has been identified and names have been forwarded to the LSP director.
- The LSP program director will ensure parents of LSP students are involved in the student's learning process. The LSP Advisory Committee and Parents Advisory Committee will make recommendations and give input on strategies to engage parents. Workshops and orientations for parents will address topics such as: 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. Two Creatica model trainings were provided to all 28 Districts. The training consisted of how to address student learning needs during study sessions at home. In addition, the training resources discussed the different intelligences theories and how to improve the supporting practices based on student learning capacities. The main purposes of these workshops were to train parents on how to become active participants in assisting LSP students after school.

Future

- In summer of 2015, the LSP circular letter will be revised and finalized for school 2015-2016 and 2016-2017. If there are any changes to the circular letter, the procedural manual will be reviewed and revised to align with the revised circular letter. This information will be disseminated in August-September 2015 through 28 District orientations.
- In summers of 2015-2017, PRDE LSP centers will provide a summer camp for LSP students across the island. The camp will provide extended opportunities for LSP students to continue to enhance their use of the Spanish language.
- Supplementary textbooks, tablets, and materials will be purchased to continue to enrich the language and reading skills of the LSP students including LSP students in the special education program. In school year 2016-2017 a curriculum and language laboratory will be established in Districts with high enrollment of LSP students in an after school program to accommodate the needs of students who may lack the resources at home and to continue to enhance the Spanish language proficiency.
- The second phase of WIDA training is ongoing and will be finalized in 2015. The orientations to the teachers will continue and be based on the needs assessment from teachers to determine the training needs of teachers so that they address the Spanish language needs of LSP students. These needs assessment collection will be completed by May 2015. This is an ongoing effort and will continue and sustained in 2016 and 2017. Training and orientations for counselors, social workers, and other LSP student-serving professionals continue and will be sustained through 2016 and 2017 and will be delivered in all 28 Districts. Weekend residential trainings will be provided to education professionals including directors, social workers, guidance counselors, etc. during 2016-2017. All the different academic programs must incorporate LSP strategies and training in their schedule.
- Students are taking evaluations and PRDE will be providing a report of the proficiency results by May 2015. Ongoing meetings will be held through 2016-2017 to continue and sustain evaluation efforts. Follow up activities will be conducted in 2016-2017 regarding progress of LSP students to inform stakeholders of the achievement of their children.
- Continue supporting students and families by visiting classrooms, Districts, regions, and other LSP programs. These activities will be sustained throughout the school year with increased focus on direct services to students and families. One LSP facilitator was appointed to Humacao and Caguas regions and additional LSP academic facilitators will be recruited for each region to provide coaching and support to LSP student serving professionals in 2016 and based on the LSP student enrollment.
- On March 31 there will be a respect of diversity day for parents of LSP students and is an open house at the PRDE which will offer workshops on learning techniques and other activities that are going to be designed for parents and students. A parent involvement activity is also planned for May 2015 to disseminate information to parents as well as offer training and other workshops that support LSP students in Spanish language proficiency. Beginning March 31, 2015 additional parent trainings will be held for parents and will be ongoing through 2015-2016. Parent professional development future trainings will be continued through 2016-2017.

Advanced Placement Courses

PRDE's goal is to provide high performing students who wish to pursue a college career with a variety of academic experiences. To accommodate these students, we offer advanced placement (AP) courses in the subject areas of Spanish, English and pre-calculus in grade 12. 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 courses they wish to take. These courses help students have an easier transition to the world of postsecondary education and provides students with opportunities to obtain college credit by passing a standardized test that is developed by the College Board for each one of the AP subjects.

Because IHEs have certified that PRDE's new standards are aligned with college course requirements, students who satisfy a predefined academic criteria can participate in advanced courses as early as 10th grade. In addition, PRDE is forming new alliances with the University of Puerto Rico. These new programs enable PRDE students to enroll in additional online advanced placement courses. Through these courses, students can obtain college credit and experience a smooth transition into postsecondary education. Currently, PRDE has students enrolled in advanced math courses through the MATH Cloud project. This project allows students to be in contact with the professor and classmates in a live classroom mode to support clarifications and further explanations of concepts. After the first year of implementation of this new programs, PRDE will expand these efforts to other content areas.

PRDE is in the process of revising its definition of middle schools and recently initiated process to modify the curriculum and learning activities for middle school students. The vision for this initiative is to prepare middle school students to take advanced courses and will also provide 7th grade students with access to curriculum planning supports based on results of assessments provided by the College Board.

Collaboration with Institutions of Higher Education in Puerto Rico

PRDE continues to work closely with all IHE's in the development of other initiatives to promote the creation of and improvement of the quality and outputs of Puerto Rico's education system. PRDE had signed different alliances with IHE's to reach the goal. More specifically, PRDE is working with IHE towards the following goals:

- Ensure PRDE's academic standards are aligned with the performance expectations for first year college students;
- Develop indicators of College Readiness and report college going rates; and
- Revise Teacher Preparation Programs to ensure that
 - teacher preparation programs attract stronger candidates
 - There is a statewide curriculum for integrating the PRDE's content standards into pre-service teacher preparation programs.

Alignment with College and Career Level Expectations

The Office Academic Affairs oversees collaboration efforts with IHE, and communicates with all 33 teacher preparation programs island wide (public and private) to ensure that the PRDE's college and career ready standards are aligned with coursework for first year university students. The University of Puerto Rico, the only four-year public university in Puerto Rico, has determined that high school students who master content standards and grade level expectations will not need remedial courses during the first year of college. All other non-public universities have also approved PRDE's content standards as aligned with college and career ready standards.

Accomplishments

- An advisory committee of university professors from public and private universities has been formed to work closely with PRDE in the development of a long-term plan for a continuous review of PRDE's curriculum, standards and assessments.
- PRDE began conversations with representatives from industries and professional organizations to review PRDE's vocational programs and the highest career-level expectations.

Initiatives to Increase College Readiness

PRDE believes its efforts to revise its standards promotes college readiness. As has been indicated, PRDE's standards are vertically and horizontally aligned and have sufficient rigor to ensure students in PRDE's public education system are prepared to meet the challenges of post-secondary learning. In addition, PRDE has created public policy based on the findings of a study on the Profile of a Graduate, which establishes the competencies that the student must have in order to be successful in higher education. This public policy guides decision making at the Central, District and school levels.

PRDE has also developed various collaborative alliances with private and public entities provide students with theoretical and practical learning experiences that relate to college and career ready expectations. These alliances have enabled PRDE students to participate in internships, job training programs and other practical learning opportunities. In 2013 PRDE began implementing as PreK-16 initiative in collaboration with industry and IHEs. Through this program, students access to a well-designed sequence of professional and academic opportunities based on their specific career interests.

PRDE partnered with the UPR's Project Access to Success (Proyecto Acceso al Exito), funded by a College Access Challenge Grant awarded to the UPR. The goal of the grant is to strengthen and build alliances that sustain programs and expand the outreach activities for students who may be at risk of not enrolling in or completing college. Through this grant, a collaborative educational Prek-16 project has been established. As part of this project, PRDE will incorporate specific activities in its academic and vocational programs to provide our students diverse and enriching learning experiences from early childhood to high school. This program provides information to students, parents, counselors, and teachers about higher education. Online tools such as <http://exito.upr.edu> provides students and families information about the benefits of higher education. In addition, there is an interest inventory for the student to identify potential careers at <http://exito.upr.edu/docs> and a Roadmap program encourages students to think about and plan their university education beginning in the 7th grade.

In addition to the Project Access to Success Project, PRDE also engages in the following activities:

- All PRDE 11th and 12th grade students are provided with free college entrance exams.
- All PRDE 11th and 12th grade students are provided with a guide that facilitates their decision making and transition to higher education.
- All PRDE 11th graders who score advanced in 3 of the 4 standardized test subjects are eligible for early enrollment in an IHE
- Open houses at the University of Puerto Rico are held for students and designed to motivate students toward college attendance. During open houses, UPR opens their doors to PRDE students in 3rd and 4th grade from public and private schools as well as their professional counselors so they can visit the university and experience college life by spending time on campus.
- PRDE invites students to attend summer camps at UPR. These camps provide potential college students from elementary, middle, and high school a variety of academic experiences and cultural opportunities at UPR so that they can experiment the diversity and richness of university living and college life.
- Extended school day clubs are offered in partnership with the Centro Universitario for access to UPR-Mayaguez and were designed to encourage college aspirations.

Accomplishments

- Since 2009, professional development opportunities are offered to all school counselors in Puerto Rico and abroad to help ensure they provide students with quality advice and guidance related to occupational counseling, transition from high school to college, and the integration of technology.
- In 2013, 626 high school students participated in a summer camp designed to strengthen the required secondary academic competencies for college entrance. Students participated in activities related to college and career exploration.
- Two sessions of elementary, middle, and high school Science and Math Clubs have been completed during first semester of the 2014 school year and the first edition of writing in Spanish and English clubs were also completed. Presently, 300 students from all levels from the Mayaguez Region have been reached through these initiatives including students who live in public housing projects.
- In 2014-2015, PRDE reviewed several Circular Letters to continue directing their efforts toward and integral processes that contribute to the successful preparation of students for higher education or transition into careers. Some of the Circular Letters that were revised include: Circular Letter #12 2014-15 Norms for the Organization of Occupational Effort in High School (Normas para la Organización de ofertas Ocupacionales en el Nivel Superior). Circular Letter # 37 Public Policy for the School Organization and Requirements for Graduation of Elementary and High School (Política Pública para la Organización Escolar y Requisitos de Graduación de las Escuelas de Comunidad Elementales y Superiores). Circular Letter # 16 2013-2014 Public Policy to establish procedures and implementation rules for activities related to school retention (Política Pública para establecer procedimientos a seguir en la implementación de las Normas de Retención Escolar). Other efforts accomplished include training to educate all counselors about Flexibility and college and career readiness and incorporated the ASCA National Model. Counselors at all 3 levels (elementary, middle, and high) were hired and assigned to schools.

Current Efforts

- In 2014-15, RELNEI offers continuous technical assistance to all program directors, counselors, and student services personnel regarding the Prek-16 model and effective practices from other states. Presently, workshops and telephone conferences are being offered to support the model and to provide professional staff the tools necessary to promote and provide college attendance activities for their students.
- College Board online reviews (www.repasoupr.org) are provided to assist student with strengthening their academic competencies prior to taking the college entrance exam while at the same time providing teachers the opportunity to provide online tools on instructional processes.
- College scholarships are offered to talented students to attend university classes. Presently, 35 (2014-2015) students have received scholarships and have taken colleges courses and it is anticipated that approximately 200 more students will be awarded these scholarships during or before the summer of 2015-2016.
- A mentoring portal between school and university students exists to support mentoring activities. It is expected that through this partnership the process of transition from school to university will be smoother and simpler especially for students registering at UPR.
- A collaborative agreement exists that will convert Gloria Gonzalez School in Isabela into an educational research center that will support the integration and use of STEM in PRDE schools.
- A collaborative agreement with ESC. Dr. Hiram Gonzalez de Bayamon and the University of Puerto Rico and the Bayamon Municipality will support an education research center specialized in early learning practices.
- A collaborative agreement among Johnson & Johnson, Aspira, and PRDE is established for the Bridge to Employment program.
- A collaborative agreement with the Interamerican Univesity, Sagrado Corazon, Catholic, Ana G Mendez University and UPR is established for the articulation of the systems with the goal to streamline the process of admission (GPA and PREPA) to postsecondary education.

Future Efforts

In 2014-2016 efforts to develop and strengthen collaborative agreements with public and private institutions and PRDE will continue. These efforts are expected to provide a variety of academic and cultural initiatives and projects that are directed toward elementary, middle, and high school students so that they can experiment the diversity and richness of the university culture. Specifically:

- PRDE has a collaborative agreement with ASPIRA and TRIO programs. PRDE and UPR have been collaborating with the ASPIRA and TRIO programs to support the increase of participation in post-secondary education for traditionally underserved students.
- An occupational portfolio is an online tool that will be available in August of 2015-2016 to support higher education and career aspiration plans. Orientations will be provided to school counselors so they can share the information with their students and also provide support through the process so that they can have an electronic portfolio to help them document their goals, achievement, and future goals for a career or higher education.
- In 2015, it is expected that Circular Letter *17 2014-2015 regarding PRDE counseling programs in schools will be assigned to further strengthen counseling efforts for students at the school level.

College Going Rates and Data Collection

Current Efforts

PRDE collects data on college-going enrollment data within the first semester of a PRDE student enrolls in a public IHE. This information is collected by high school counselors. As part of the Pre K-16 Project PRDE and to comply with regulations for ESEA Flexibility indicated in the State and Local Report Cards Non-Regulatory Guidance PRDE has taken steps to improve and assure quality data collection on college-going enrollment.

During the current academic year, PRDE realized that the UPR does not have the data infrastructure to facilitate the accurate collection and reporting of college going rates. As a result PRDE cannot access to the information it needs to provide in the State and Local Report Cards and to the Pre K -16 Project for follow up. The statistical data available from the UPR system is very general and does not include the information needed for student accurate and compliant reporting

To respond to this challenge, the Secretary of Education has intervened directly by holding meetings with the President of the UPR and other IHEs and their governing bodies. These meetings are held quarterly and are focused on identifying options to follow up on student enrollment at the UPR and its 12 campuses. PRDE personnel from the Office Academic Affairs also participate in monthly meetings of a council on Pre K-16 issues. UPR is currently working with PRDE to develop efforts to improve their data collection system and provide quality information on enrollment and retention rates. The UPR governing body has required that UPR develop a uniform system to improve data collection regarding their college student's retention rates.

It should be noted that some private IHE's, such as the University of Sagrado Corazon, the Interamerican University and the Caribbean University already collect information on college student retention. These IHEs are able to provide longitudinal data on college student retention rates. However PRDE needs to develop solutions for other IHEs across the island. To this end, PRDE has formed an internal team, composed of personnel from the Office of Academic Affairs, the Planning and School Development Office, and the Student Support Services Auxiliary Secretariat. These offices hold regular meetings with private IHE's and PRDE provides provide guidance, orientation and coordinate technical assistance in developing a compliant and robust data management system. Some of the activities that have been held include webinars, workshops and group orientations. PRDE believes these efforts will help ensure public and private university systems can provide the information needed to prepare high quality State and Local Report Cards.

All stakeholders agree these data systems are necessary to capture valuable information that will contribute to enhance college and career readiness strategies and activities. The envisioned data systems will also include data collection on college credit accumulation rates, which not have been collected or addressed by any of the IHE, public or private. PRDE has leveraged external resources such as the Center on College and Career Readiness Content Center, the Regional Northeast and the Islands Center (RELNEI) and Florida and the Islands Comprehensive Center (FLICC) for to for support and technical assistance, and/or as resources for the activities support this initiative. With their collaboration the PRDE internal team has already been researching other states' data collection systems.

In conjunction with the RELNEI, PRDE has prepared a high quality action plan to address the obstacles in accessing the information needed to include public college-going and college credit accumulation rates; as well as the all elements required for compliance with the Non Regulatory State and Local

Report Cards Guidance for states with ESEA Flexibility. The plan engages all IHEs, with the PRDE internal team as lead in the initiative.

Future Efforts

In collaboration with the IHEs, that have longitudinal data collection systems in place, during the 2015-16 SY PRDE will complete the design and pilot a model reporting system. The model will be initiated with students from SIG schools cohort that graduated in SY 2010-11. These students have already been identified and data collected on college enrollment and college credit rates will be available in May 2015. The ultimate goal of the plan is to develop a high quality Student Success Reporting System (SSRS) to be put in place during the 2016-17 SY. This will facilitate the acquisition of data to comply with Flexibility, including all the elements required.

Teacher 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 began to address teacher preparation programs' accountability for teacher preparedness. PRDE is collaborating with teacher preparation programs and other initiatives related to teacher preparation in order to make certain that teacher are being prepared with educational experiences related to the professional competencies required of the teaching profession. These initiatives include: aligning the subject matter taught in each content of areas and teacher preparation coursework and documenting the professional teaching competencies needed in order to ensure PRDE students satisfy learning objectives.

Accomplishments 2012-2014

- During 2014, PRDE revised its "Guidelines for the Classification of Teacher Preparation Programs in Puerto Rico (2006)" to integrate more rigorous standards for the classification of teacher preparation programs.
- PRDE worked with the 37-teacher preparation programs (public and private) and el Comité Timón de la Red Colaborativa (cooperative alliance between the PRDE, el Consejo de Educación de Puerto Rico and the College Board) to examine the regulations and guidelines that define measures of program effectiveness beyond the pass rates on teacher certification tests.
- PRDE created a draft of the recommendation for improvement of teacher preparation programs. Once approved by the Puerto Rico Department of State, these new recommendations will be disseminated and discussed with all teacher preparation programs and other internal and external interest groups.
- In May 2014 PRDE established an Educator Certification regulation that requires that a teacher must have graduated with a 3.0 GPA before a professional certificate can be issued. PRDE's Professional Development Institute will guarantee this requirement is met before teachers can receive a regular professional certificate.
- The PRDE Educator Practice program established the guidelines for the final practicum requirement that teacher education program students must complete prior to graduation and teacher certification.
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- As a part of the alignment between the new PRDE curriculum and the teacher preparation programs, workshops were conducted for the IHE about the new curriculum addressed by specialty area to the specialists of the teacher preparation programs in order to assure us that the academic personnel of those programs orient and discuss these contents with their students.

Future Efforts

- PRDE will continue to explore opportunities to 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 continue to work collaboratively with the directors of teacher preparation programs and facilitate workshops for subject area experts to ensure they understand and can teach students about PRDE’s new content standards.
- In March 2016, Puerto Rico will be implementing the new Teacher Certification Test. During 2015-2016 the PRDE, College Board and the teacher preparation programs will publish and discuss with the students, professors and other interest groups the new regulations and important issues
- PRDE will continue working with IHEs, in collaboration with the College Access initiative in 2015 a process to provide IHE's a data linking teacher preparation programs graduates to PRDE's students outcomes.
- During 2015-2016, PRDE will development and implement guidelines for new teacher induction program with the school Districts, the teacher preparation programs and other stakeholders. The Teacher Preparation Programs accreditations require them to follow and give induction to their graduates up to 5 years

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. PRDE's high quality assessment systems and growth model have been approved by USED and PRDE's Technical Assistance Committee. Puerto Rico annually administers 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.

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. PRDE's main assessment for grades 3-8 and 11 is called the Prueba Puertorriqueña de Aprovechimiento Académico (PPAA). The comparable assessment used with Special Education Students is called the Prueba Puertorriqueña Evaluación Académico (PPEA). Large print and Braille versions are also available as required. PRDE has a long track record of high levels of participation in its assessment program.

PRDE developed performance level descriptors (PLDs) for the PPAA and PPEA. These PLDs are 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 provide measureable outcomes as reflected in the PPAA and PPEA.

PRDE's current assessment contract will be extended to allow for uninterrupted administration and scoring through the 2013-14 school year. A new Request for Proposal (RFP) is being developed to secure a vendor to develop future assessments. When working with its assessment development vendor, PRDE will continue to carry out a plan for ensuring the validity of its assessments and ensure the process and final product are consistent with PRDE's technical standards for assessment as well as its stated criteria for high quality, rigorous assessments.

PRDE continues to explore the opportunities to administer its assessments online. A pilot for line testing for Science was completed in 2014 and in 2015 the Spanish assessment will be piloted in an online administration.

Assessments Aligned to New PRDE Core Standards

The PPAA and PPEA test are aligned with the academic standards and grade level expectations revised in 2014. Puerto Rican educators have participated in all areas of development related to these tests.

Beginning with the 2014 PPAA administration, PRDE began to pilot new items for the Spanish language arts assessment in every grade. The PPAA 2015 will consist of operational test forms with embedded field test items.

PRDE new high quality assessments will be first administered in the April of the 2014-15 school year. In each subsequent year, PRDE will continue to build upon the high quality of its current system. It

should be noted that while PRDE will continue to field test items in accordance with the test development blueprint, PRDE will not include field test items in accountability determinations.

PRDE remains committed to the 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 its operational assessments. Ongoing item development guarantees that PRDE's item bank will continuously meet the rigor of a high quality assessments. As has been indicated, items that appear in field test slots will not be used in accountability determinations.

As part of alignment consideration its new core standards, the PPAA test now include the assessment of students' skills in reading texts and using information from those texts to respond in writing to a prompt 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. Each year PREDE adds, at 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 allow PRDE to gather information on students' skills related to a key CCSS concept included as a mayor skill in Spanish curriculum. This item type will be scored for the first time in 2015.

In support of its ongoing test development process, PRDE has and continues to engage in the processes described in the PPAA Technical Manual, including:

- Item writer workshops in order to provide the teachers with training on the item writing process as well as the opportunity to write items for the PPAA.
- Content and bias Review meetings to ensure certified Puerto Rican teachers verify that items are correctly aligned to the standards, expectation and specifications for the content areas to be assess, to verify the balance treatment and control of potential bias stereotyping and insensitivity in the test items or in related materials and also verify the appropriateness for all Puerto Rican students enrolled in the grades and content area.
- Validation process to ensure alignment between all items in the PPAA to the test development blueprints from the PRDE.

Students have the opportunity to practice the content and the questions that will be addressing in the test through the practice exercises available at the PRDE webpage. New practice exercises for the 2014-2015 academic year were created for each grade and content area. A version of an electronic practice test called ePats is also available as an internet link that can be used by teacher for content review and at home as an additional practice.(www.prassessment.com). ePats provide a test version where the students may go back on their answers, get scores and the opportunity to try over the items provided. The students and the teacher are able to print the results page for their records and the teachers use appropriate rubric to the constructive response exercises. Also allow the student to become familiar with on line testing.

Alternate Assessments

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 even with accommodations. The *Prueba*

Puertorriqueña de Evaluación Alternativa (PPEA) was developed under the portfolio strategy as approved by USDE. PRDE 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. PRDE's content specialist reviewed the selected grade-level expectations from the content mapping process and matched the strands to those strands instructed and assessed through the Pruebas Puertorriqueñas de Aprovechamiento Académico (PPAA) which is the general assessment. This has resulted in a system that is organized by grade level and content strands that are consistent with those of the PPAA.

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. High stakes assessment have seen a series of changes in content and structure with the development and approval of the PRCS 2014. The new standards have also resulted in change to the PPEA.

The PPEA for the 2014–2015 school year represents a multi-disciplinary approach to assessing student learning and provides access to grade-level learning standards and varied opportunities to learn. One of the strengths of the PPEA is its flexibility in allowing teachers to select the most appropriate evaluation activities to meet the individual needs of students with significant cognitive disabilities while fulfilling the requirements for the targeted assessment tasks.

A crosswalk document was created to demonstrate the alignment of performance expectations from the 2007 standards to the 2014 standards. Based on this crosswalk, new performance indicators were suggested as replacements. Additional indicators were incorporated additions when no alignment was found. Alternate indicators are consistent with the general education PPAA content requirements. The process of review, revision and approval was managed and executed under the leadership of the Office of Academic Affairs.

To support the PPEA assessment training process and provide teachers with a tool to incorporate best practices on the alignment of standards, instruction, and assessment, teachers have access to a series of instructional modules for all PPEA portfolio entries aligned with the 2014 standards for all required indicators. PPEA assessment training is provided annually to different groups of special education teachers: new incomer administering PPEA; teachers with experienced but administering PPEA as first timers and for experienced teacher administering PPEA. Best practices from schools that have had the best outcomes from the PPAA are captured and disseminated annually. Teachers have access to 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.

Preparations for administration of the PPEA began during the spring 2014 and culminated with the current administration as scheduled for January- March 2015. Portfolio scoring will take place in April 2015.

LSP Assessments

Consistent with our belief that all students deserve the opportunity to show what they know and can do, students identified with Spanish limited Proficiency (LSP) also participate in the statewide assessment and are provided with accommodations. Current academic assessments procedures integrate appropriate accommodations as established in PRDE's Accommodations Manual (2004). For identification purposes LSP students participate in a screening test as mandatory by Title III specifications and in an annual exit test after correspondent services as required by the students.

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.

WIDA standards were aligned to the PRDE's Spanish standards in May 23, 2014. This process was overseen by the Spanish Academic Facilitators. A Memorandum of Understanding between WIDA and PRDE was signed in August 2014 in order to agree in the use of WIDA Language Development Standards. Training to academic facilitators and teachers has been provided in order to present the WIDA standards and their alignment with PRDE's new Spanish standards.

The operational form of the PODER (*Prueba Óptima del Desarrollo del Español Realizado*) test for kindergarten was released in August 2013. Operational test forms for grades 1-2 were available in August 2014 and will be available for grades 3-5 in August 2015. 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.

Salsa (Spanish Academic Language Standards and Assessment) is a project of evaluation of the academic language of the Spanish funded by the United States Department of Education, and whose financing was granted to the Board of education of the State of Illinois on behalf of the WIDA Consortium of Puerto Rico.

Non Tested Grades and Subjects

Over the previous two years, PRDE has explored various options for developing and implementing assessments in its non-tested grades and subjects.

A significant amount of effort went into developing the strategy PRDE would use to develop assessments for non-tested subjects. PRDE leadership engaged in research and conducted various site visits to different States throughout the current school year to research to ensure it made an informed decision about the selection of a feasible and appropriate assessment method. Also PRDE key leaders have been participating in the CCSO assessments meetings to identify the best states practices.

PRDE seeks to develop assessments for non-tested grades and subjects that will provide valid and useful information about students' mastery of content standards and also be used to measure student growth and incorporated into the educator evaluation process. For these reasons, PRDE seeks to use a pre/posttest to assess student learning in non-tested grades and subjects. Use of a pre/posttest will provide a measure of student learning before and after the instruction. The gain between pre/posttest administrations will be used in to calculate growth.

PRDE has initiated a Request for Quote proposals (RFQ) to obtain cost estimates for vendors that can support the development of assessments in non-tested grades and subjects. The RFQ solicits costs estimates for pre/post assessments that will be administered to non-tested grades and subject areas and will define the need and the strategies under consideration to ensure PRDE has assessments for the non-tested content areas that can be used to establish the student's achievement value to be used in PRDE's educator evaluation system. The technical specifications for these assessments include 1) being valid for the purposes of teacher evaluation, 2) producing scores that can be mapped on a Transition Matrix for the purpose of gauging student growth, and 3) being appropriate for use with all students.

PRDE anticipate a high costs associated with the development of these assessments, given the broad scope of content to be assessed and the technical specifications required for the assessments. The development pre/post tests will be prioritized to focus on the following content areas: social studies, health education, visual arts, theater, ballet, physical education, occupational and technical study programs and other specialized courses.

PRDE believes the work it recently completed to revise its content standards will facilitate the process of developing these pre/posttests. All content areas have revised their curriculum and established indicators for the students' performance per grade. PRDE will prioritize these indicators within each subject and grade and this information will be provided to the vendor to develop the assessment. This prioritization will inform the process the vendor uses to develop the test blueprint and define the expectation for student performance after instruction is delivered. PRDE's Academic Facilitators will facilitate this process with the external providers. This assessments will be available through 2015-2016 school year.

These approaches for measuring academic growth in non-tested grades and subjects is consistent with approaches currently being used by States with approved ESEA Flexibility plans.

Year Growth Model

PRDE has established a growth model that tracks students' academic achievement longitudinally. PRDE's growth model evaluates changes student achievement in Spanish language arts and mathematics in grades 4 through 8 using scores from the current PPAA and PPEA assessment systems. This growth model, which is a Transition Matrix model, does not apply to high school students (grade 11) because these students do not have scores from the previous year.

PRDE uses a Transition Matrix model to calculate growth. The current model is based on the cut scores from previous administrations of the PPA and PPEA. These previous test administrations assessed student mastery of PRDE’s old content standards (those in place from 2007 to 2013).

The key design features of PRDE’s Transition Matrix are outlined below:

Categorical Model Transition Matrix

Question Answered	Are students making adequate progress across performance levels?
Analysis/variables	Transition Model, Transition Matrix, Value Table
Primary Interpretation	Growth description and growth prediction
Statistical Foundation	Gain-based model
Metric Scale	Change in performance level categories (categorical)
Data	Performance levels articulated across years (implicit vertical scale), student status expressed by performance level, and value for transitions if value tables are used
Group-level Statistic	Percent of students "on-track" to proficiency or average value tables
Set Growth Standards	Define cut scores for performance levels and values for value tables, specify rules for students being counted as "on track"; establish what average value is good enough
Operational Examples	NCLE Growth Model (e.g., Delaware and Iowa)

Source: Castellano & Ho (2013)

**Growth Model Choice Matrix
ESEA Flexibility States**

Model	State
Gain Score	Alabama, Indiana, Smarter Balanced (Connecticut, Vermont)
Trajectory	Arkansas
Categorical (Transition Matrix, Value Table)	Alaska, Delaware, District of Columbia, Puerto Rico, Virginia*
Residual Gain	
Projection (Growth-to-Proficiency)	Minnesota, Missouri
SOP	Colorado, Hawaii, Idaho, Kansas, Kentucky, Maine, Massachusetts, Nevada, New Hampshire, New Jersey, Oregon, Rhode Island, South Dakota, Utah, Virginia*, West Virginia, Washington, Wisconsin, Wyoming
Multivariate (Value added)	Florida, Georgia, Iowa, Louisiana, Michigan, Mississippi, New Mexico, New York, North Carolina, Ohio, Oklahoma, Pennsylvania, South Carolina, Tennessee
Not enough info	Illinois, Texas, Arizona (State Model)
No Flexibility Application	California, Nebraska, North Dakota, Montana

PRDE has identified the following benefits of its growth model: it 1) uses database of matched students over time, 2) does not require a common (vertical) scale across grades, 3) does not require confidence intervals, 4) handles nonlinear growth, and 5) and be used with alternate assessments that do not have scale scores. This model is simple to communicate with stakeholders and is currently used by several states.

PRDE’s current Transition Matrix model appears in Figure 1. As can be seen in Figure 1, the extreme low and high achievement levels (pre-basic and advanced) are split into two ordinal levels and the middle categories (basic and proficient) are split into three levels, so that growth *within* these achievement levels can be counted in addition to growth *across* levels. The points allocated to the transitions assign points to students who increase one or more level across years if they are below mid-basic, with the number of points increasing as the number of levels improved increases. The maximum number of points is 6, which is associated with “high advanced.” Students who are mid-basic or above are assigned 2 points if they maintain their status across years, and more than 2 points if they increase one or more levels, as indicated in Figure 1.

Figure 1

Year One	Year Two									
	Low Pre-Basic (1.1)	High Pre-Basic (1.2)	Low Basic (2.1)	Mid Basic (2.2)	High Basic (2.3)	Low Proficient (3.1)	Mid Proficient (3.2)	High Proficient (3.3)	Low Advanced (4.1)	High Advanced (4.2)
Low Pre-Basic (1.1)	0	1	2	3	4	5	6	0	0	0
High Pre-Basic (1.2)	0	0	2	3	4	5	6	0	0	0
Low Basic (2.1)	0	0	0	3	4	5	6	0	0	0
Mid Basic (2.2)	0	0	0	2	3	4	5	0	0	0
High Basic (2.3)	0	0	0	0	2	3	4	5	0	0
Low Proficient (3.1)	0	0	0	0	0	2	3	4	5	6
Mid Proficient (3.2)	0	0	0	0	0	0	3	4	5	6
High Proficient (3.3)	0	0	0	0	0	0	0	3	5	6
Low Advanced (4.1)	0	0	0	0	0	0	0	0	3	6
High Advanced (4.2)	0	0	0	0	0	0	0	0	0	6

Figure 2

Year One	Year Two									
	Low Pre-Basic (1.1)	High Pre-Basic (1.2)	Low Basic (2.1)	Mid Basic (2.2)	High Basic (2.3)	Low Proficient (3.1)	Mid Proficient (3.2)	High Proficient (3.3)	Low Advanced (4.1)	High Advanced (4.2)
Low Pre-Basic (1.1)	Maintained	Slightly Improved	Slightly Improved	Improved	Improved	Significantly Improved	Significantly Improved	Significantly Improved	Significantly Improved	Significantly Improved
High Pre-Basic (1.2)	Slightly Regressed	Maintained	Slightly Improved	Slightly Improved	Improved	Improved	Significantly Improved	Significantly Improved	Significantly Improved	Significantly Improved
Low Basic (2.1)	Slightly Regressed	Slightly Regressed	Maintained	Slightly Improved	Slightly Improved	Improved	Improved	Significantly Improved	Significantly Improved	Significantly Improved
Mid Basic (2.2)	Regressed	Slightly Regressed	Slightly Regressed	Maintained	Slightly Improved	Slightly Improved	Improved	Significantly Improved	Significantly Improved	Significantly Improved
High Basic (2.3)	Regressed	Regressed	Slightly Regressed	Slightly Regressed	Maintained	Slightly Improved	Slightly Improved	Improved	Significantly Improved	Significantly Improved
Low Proficient (3.1)	Regressed	Regressed	Regressed	Slightly Regressed	Slightly Regressed	Maintained	Slightly Improved	Slightly Improved	Improved	Improved
Mid Proficient (3.2)	Regressed	Regressed	Regressed	Regressed	Slightly Regressed	Slightly Regressed	Maintained	Slightly Improved	Slightly Improved	Improved
High Proficient (3.3)	Regressed	Regressed	Regressed	Regressed	Regressed	Slightly Regressed	Slightly Regressed	Maintained	Slightly Improved	Slightly Improved
Low Advanced (4.1)	Regressed	Regressed	Regressed	Regressed	Regressed	Regressed	Slightly Regressed	Slightly Regressed	Maintained	Slightly Improved
High Advanced (4.2)	Regressed	Regressed	Regressed	Regressed	Regressed	Regressed	Regressed	Slightly Regressed	Slightly Regressed	Maintained

A major advantage of the Transition Matrix approach is that it applies to both the PPEA as well as the PPAA assessment methods. Analysis of academic growth scores was calculated using 2014 PPAA and PPEA results. The business rules guiding calculations for cut scores for the PPAA were based on TAC recommendations and expert judgment. 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 business rules guiding calculations for cut scores for the PPAA were based on TAC recommendations and expert judgment. The island wide value table for Spanish and Math are available in the technical documentation.

Each year growth reports are delivered directly to schools. These reports help school directors and teachers understand changes in students' PPAA and PPEA scores. The reports categorize changes in performance as follows: Improve significantly, slightly improve, improve, maintain, slightly decrease, decrease or significantly decrease. PRDE educators have indicated that they feel these reports assist schools in instructional planning to ensure the needs of all students are met. The Growth Matrix categories are presented in the table below:

2014-2015	2015-2016	2016-2017	2017-2018
2009 cut scores for reporting	2016 cut scores for reporting	2016 cut scores for reporting	Same as previous year
2009 cut scores for growth	2009 cut scores for growth	2016 cut scores for growth	
Old transition matrix	Old transition matrix	New transition matrix using 2016 cut scores	
	Develop new transition matrix using 2016 cut scores		

The growth model PRDE will use with grade 3 students and high school students, including those 11th grade students that take the PPAA or PPEA, will be consistent with the growth model used for non-tested grades and content areas. The process for developing this second growth model will be consistent with the process used to create the growth model presented above.

Consistent with recommendations advanced by PRDE's TAC, the Transition Matrix will also be used to calculate growth for students assessed using pre/posttests in non-tested grades and subjects. Academic growth will be calculated based on differences between pre/post performance assessments. The same standard setting process used with the PPAA and PPEA will be applied to distribute differences in pre/post scores across performance levels. In this way, PRDE will determine student growth the same way for tested and non-tested grades subjects.

PRDE's growth model produces values for students' academic achievement that can be incorporated into PRDE's educator evaluation system. Details regarding how the Transition Matrix growth value is incorporated into educator evaluations are provided in Principle 3 of this request.

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). Accommodations for the PPAA are selected based on accommodations that the student

regularly uses during instruction and that are written in the student's Individual Educational Plan (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.

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.

PPEA assessment training is provided annually for different groups of teacher: new incomer for Special Education administering PPEA; teachers with experienced in Special Ed but administering PPEA as first timers and for experienced teacher administering PPEA.

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

Under Flexibility, PRDE has been implementing a differentiated accountability model based on the tenets of ESEA that meet the U.S. Department of Education's guidelines as addressed in the documents entitled *ESEA Flexibility* and *ESEA Flexibility Frequently Asked Questions*. PRDE's new accountability system provides increased transparency by allowing PRDE to set ambitious new AMOs, identify priority, focus, and reward schools, and customizing support to non-categorized Title I schools. PRDE believes parents, teachers, school directors, and members of the community have become more engaged in the process of transforming low performing schools and make meaningful contributions that result in a public school system that meets the needs of all students as a result of the past two years of our implementation efforts.

Puerto Rico set rigorous AMOs based on 2011-2012 island-wide performance assessment data to guide its implementation of differentiated accountability. PRDE expects that the use of AMOs will lead to a 50% decrease in the percentage of non-proficient students in each subgroup within 6 years. PRDE expects that an improvement in proficiency will provide encouragement to all schools to continue to progress.

As PRDE's overall system demonstrates improvements in how it educates all children, including students with disabilities (SWDs) and limited Spanish proficient (LSP) students, the public education system will experience lower dropout rates and higher achievement rates. PRDE believes this model will also encourage schools to work toward closing achievement gaps by focusing efforts on the reasons for low academic achievement and providing a rewards and recognition program. PRDE believes its new differentiated accountability system has created clearer expectations for what educators need to do to improve the performance of the lowest-achieving groups of students. It also creates new opportunities for educators to learn from best practices that have been effective at producing higher achievement among certain groups of students.

PRDE believes these systematic improvements in how the accountability system defines and reports student performance will result in more students mastering the curriculum and meeting college and career ready standards.

Puerto Rico's Student Subgroups

PRDE's differentiated accountability model continues to measure student achievement in Spanish language arts and mathematics, which are both approved for inclusion by USDE. PRDE will calculate

AMOs as established by ESEA Flexibility for students in grades 3 through 8, separate from grade 11, with a minimum n size of 30. The following seven identified subgroups from the Puerto Rico Accountability Workbook will continue to be used and were approved by the USDE in 2009:

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 additional following subgroups:

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

Differentiated School Supports

PRDE identifies reward, priority, and focus schools using a combination of performance information including 1) achievement results from the annual Spanish language arts, mathematics, and ESL PPA and PPEA assessments, 2) graduation rates, and 3) progress indicators based on three years of assessment data, graduation rate data, and achievement gap information between the highest (greater than 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”. Based on the schools’ identified category, PRDE’s leadership at the Central and District levels will develop differentiated supports that align with the teaching and learning needs evidenced in each school.

The identification of these 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 differentiated accountability system means that several of our schools that serve students with 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 student achievement expectations.

PRDE’s model for differentiated accountability has identified as priority schools at least 5% of the total number of schools within the PRDE system. Thus, the total number of schools in this category is 72 schools. This includes 22 Tier I SIG schools, 14 high schools with graduation rates less than 50%, and 36 schools in the lowest 5% of proficiency and lacking progress. Similarly, PRDE identifies 10% of the total number of schools within the PRDE system as focus schools.

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 for creating systemic change in our lowest performing schools.

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 (transition) not identified as priority, focus or reward schools receive support under PRDE’s differentiated accountability system.

PRDE’s differentiated accountability system now rewards the highest performing and highest progress schools. Providing schools with recognition, support and encouragement will help them 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 improved 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 has made 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.

The methodologies that lead 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% of all schools, AND 2. The current three-year adjusted cohort graduation rate (2012-13) 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>
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Reward (High-Progress)	<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, AND 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 Cohort II SIG Schools, OR 2. High schools with three-year adjusted cohort graduation rates less than 50%, OR 3. Schools with the lowest proficiency and less than 10% proficiency progress over two years.
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 schools with the largest overall achievement gap between the 25th and 75th quartiles and lacking progress in proficiency for the 25th quartile group averaged over two years.

Authentic and Comprehensive School Plan (PCEA)

Each school in Puerto Rico is required to develop (or modify) annually its ***Authentic and Comprehensive School Plan (PCEA)*** The PCEA requires each school to:

- Review prepopulated student achievement data as well as other data captured in PRDE’s dashboard.
- Plan interventions according to school’s classification
- Plan activities that meet the State requirements and requirements of PRDE’s Flexibility Plan

- 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 achievement
- Outline school-wide professional development needs and request additional professional development to help teachers implement the new standards and 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
- Document the proposed use of State and federal funds for the current school year
- Prepare an electronic report of the accomplishment at mid-year and end of year as part of the analysis necessary for modification of the following year's plan

PCEAs contain additional detail regarding a school's academic plan and this detail varies by school.

Each year, school directors receive technical assistance from various Central Level offices to develop their PCEA. The Planning Office is responsible for collecting data for all schools, disseminating data to schools and ensuring plans incorporate data analysis, include a thorough needs assessment. PRDE uses integrated technology tools to guide the development of these PCEAs. The use of integrated technology tools makes it possible for PRDE to standardize the needs analysis and intervention planning processes. The Office of Academic Affairs determines the due date for the PCEA and provides the trainings for personnel ensure high quality development of the school's plan. The Office of Academic Affairs is also responsible for ensuring plans include the interventions necessary to comply with PRDE initiatives and Flexibility requirements and are differentiated according to the classification of the school. A compliance review is conducted by the Office of Federal Affairs

The PCEA is modified annually and updated. Schools use the completed PCEA as an action plan for continuous improvement. All schools will have support from Central and District level staff throughout the process of revising their PCEA. Through the review and approval process, PRDE ensures the alignment of interventions with school needs and integration of priority schools' plans with other system-wide curriculum and development efforts. District staff validate that schools have aligned all plans to needs assessment data prior to approval

PCEAs must include focused strategies customized to respond to evidenced needs in each academic subject area. These strategies specifically address Spanish, English, Math and Science. PRDE believes professional development should be employ job-embedded professional development that is closely connected to what teachers are required to teach. This practice will increase the likelihood that the skills and knowledge gained from such learning is immediately transferred to the classroom.

Professional Development

The professional development activities provided in support of Principle 2 focus on the transformation model's principles for radical change: Developing Effective School Leadership, Teacher Effectiveness, Comprehensive Instructional Improvement Initiatives and Data Driven Decision Making. PRDE provides job embedded ongoing professional development and Academic Facilitators at the District provide professional training and support to teachers. PRDE does not rely 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 closely with teachers at the school level on an ongoing basis to support continuous implementation through regular instructional practice and related classroom activities.

PRDE has established a Guideline that outlines the services and interventions/level of support that must be provided based on a school's classification. Tiered professional development is provided to SIG, priority, and focus schools in a more intense manner. 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. SIG and priority and focus schools will have on-site content-specific coaches and will establish Communities of Practice to support school-wide changes.

Dashboards

A Dashboard is a technological tool that contains comparative tables and graphic summaries of data at the school, student and teacher levels. PRDE's Dashboards include accountability indicators that are aligned with accountability classification criteria as well as other data needed for data driven decision making. The Information Systems and the Planning offices share responsibility for a) planning and designing processes to ensure that correct and reliable data are available on the dashboard, b) presenting data in a simple and easy to interpret manner, and c) ensuring all schools, educational Districts and Central Levels have access to this information. In order to support data driven decision making, this shared responsibility guarantees the technical management (collection and presentation) of data and content. Dashboards make it possible for PRDE to present performance and improvement planning data and information to teachers and school directors. This year, PRDE has linked its dashboard with the Platform used to create the PCEA and this allows schools to access the data to create the comprehensive school work plans.

The Planning Office provides continuous training to District statisticians so they can provide technical support to schools around the use of data driven decision making practices. The Office of Academic Affairs coordinates with the Planning Office to offer training to District data coaches (statisticians) to help teachers and directors identify factors that affect learning. Next, data coaches provide support to schools so that the school can modify or develop their PCEA to reflect these new insights.

For the 2015-2016 school year, PRDE will continue calibrating the data quality and strengthening the data analysis for decision making. In this way we ensure that the data used for drafting the PCEA are reliable. The Planning Office will continue to provide training to school District statisticians so that they in turn can provide technical support to schools and maintain updated data. Additionally, the Office of Academic Affairs will continue to coordinate data trainings for District staff so that they strengthen the technical assistance provided to schools.

Summary

PRDE's implementation of a differentiated accountability system focuses resources on the lowest performing schools and those with the largest achievement and growth gaps while continuing to develop and extend supports and rewards for others schools. 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 will identify which schools, within each classification, are making progress and prioritize services to those schools within each category that are not making progress. Additional support will then be provided to those schools not making progress within their classification.

PRDE recognizes that despite improvements in some of the neediest schools, there may continue to be schools in each of these categories. PRDE believes that a 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. To this end, we have organized our internal operations and human capital in a way that will allow it to succeed at making this goal a reality.

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 assessments in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools.</p>	<p>Option B</p> <p><input type="checkbox"/> If the SEA includes student achievement on assessments in addition to reading/language 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; andb. 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 AMOs.</p> <p>i. Provide the new AMOs and an explanation of the method used to set these AMOs.</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>i. Provide the new AMOs and an explanation of the method used to set these 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> <p>i. Provide the new AMOs and an explanation of the method used to set these AMOs.</p> <p>ii. Provide an educationally 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 based 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 AMOs for Puerto Rico. The AMOs (below) follow the same subgroup system as 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).

Puerto Rico's Student Subgroups	<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.

Exhibit 1) 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.

	2008-2009	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014
Grade 3	47%	52%	54%	59%	55%	55%
Grade 4	37%	40%	44%	51%	53%	50%
Grade 5	39%	40%	44%	46%	49%	48%
Grade 6	45%	46%	48%	50%	54%	49%
Grade 7	35%	33%	37%	39%	40%	39%
Grade 8	36%	39%	45%	43%	42%	41%
Grade 11	35%	35%	38%	40%	44%	40%

Exhibit 1. Mathematics Proficiency

	2008-2009	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014
Grade 3	59%	65%	66%	70%	66%	70%
Grade 4	41%	48%	52%	55%	53%	54%
Grade 5	30%	37%	40%	41%	40%	44%
Grade 6	5%	9%	10%	15%	17%	19%

Grade 7	4%	6%	7%	8%	9%	8%
Grade 8	3%	7%	9%	9%	10%	10%
Grade 11	2%	4%	8%	9%	10%	10%

The second factor is that these AMOs are set separately by subgroup instead of by the whole school. The 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 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.

The new AMOs were developed using 2011-2012 data as the baseline for each subgroup. The goal by 2017-2018 is a 50% reduction in the percent of non-proficient students by subgroup. 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 2. Spanish Language Arts AMOs by Subgroup for Grades 3-8

Student Group	Spanish Language Arts						
	Baseline 2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18
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 3. Mathematics AMOs by Subgroup for Grades 3-8

Grades 3-8		Mathematics					
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 4. 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 5. 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.

Reward Schools

The PRDE defines reward schools as 1) schools of superior academic achievement that consists of schools obtaining the highest (top 5%) academic achievement rates for the school years 2013-2014 and 2014-2015, the highest graduation rates of the adjusted cohort of 2014-2015 and have also reached AYP in 2014-2015 and that do not show significant gaps in achievement between the 25th and 75th quartiles (Puerto Rico also will consider attendance rates as part of 2015-2016) and 2) schools with high progress, that consists of schools achieve the best (top 10%) academic progress for school years 2013-2014 and 2014-2015 and are schools of high graduation rate of the adjusted cohort of the three years from 2012-2013 to 2014-2015 and that do not show significant educational gaps. Neither the highest performing schools nor the high progress schools can meet the definition of a focus or priority school.

Reward schools will be recognized publicly and significantly encouraged to highlight the best practices of these schools and encourage leadership and quality education in other schools around the island. The PRDE will offer incentives to reward school that include public recognition on the PRDE webpage, media attention, letters to the parents recognizing the teachers and school directors, District and regional events, and recognitions of the communities in which the school resides.

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 (2012-13) 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 publicly recognizes reward schools with incentives for improving their effectiveness at assisting students to become college and career ready, as evidenced by student achievement, school progress and progress in closing achievement gaps. The rewards for high-progress and high-performing schools will be the same. 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 schools by acknowledging their efforts and use of effective practices. Second, it provides visibility to the island's top performing schools and enables them to serve as both models and resources for other schools. Third, these rewards honor the school directors' and teachers' hard work and acknowledge the important role they play in the success of their students. After a number of years of recognizing these schools, the PRDE, the schools, and the communities across the island will have developed a shared foundation of effective practices used in schools.

Accomplishments

For the 2013-2014 school year, PRDE did a calculation and identified 62 reward schools. These schools were recognized publicly on the PRDE webpage and PRED-generated press releases. Additionally, each high performance and high progress school received an economic incentive of \$6,000. The parents, managers, faculties and personnel of the school received a letter with the notification of the school's classification. For all schools to see, the regions and Districts recognized the reward schools.

For the 2014-2015 year, the calculation identified 91 reward schools, and of those 12 remained from the 2013-2014 year. The recognition remained the same as the previous year.

Current Efforts

Based on the implementation over the last two years, PRDE decided to maintain the rewards they had used in the past because the community seems to be happy with the ongoing experience. 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

Currently, PRDE is considering possible alternative incentives to schools achieving reward status. This year has added an official public recognition that distinguishes the school community as Reward from the Secretary of Education and the Governor of Puerto Rico.

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, teachers, parents and students, and the community at large). Based on feedback, 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's education at home. Participants in public forums also expressed that the recognition and rewards should be significant and promote increased community engagement and participation. The Office 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 to strengthen 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 they serve and are best positioned to 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. The Office Academic Affairs will monitor District recognition plans to ensure that they are appropriate and aligned with school level achievements and community interests.

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.

Priority Schools

Priority Schools

In accordance with the guidelines for the Flexibility request as addressed in the USDE documents entitled *ESEA Flexibility* and *ESEA Flexibility Frequently Asked Questions*, Puerto Rico identified a Priority School as a school that has the lowest-performing schools. The total number of Priority schools must be at least 5% of the Title I schools in the State. The 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. Cohort 2 Tier I SIG schools, **OR**
2. High schools with a three-year adjusted cohort graduation rate of less than 50%. **OR**
3. Schools with the lowest proficiency and less than 10% progress over two years.

A total of 72 schools have been identified as Priority schools. PRDE manages SIG and non SIG schools within the overarching category of Priority school. PRDE recognizes that each of these two subgroups will have different implementation timelines.

Of the 72 priority schools, 22 are Priority SIG schools, including one secondary school (grades 7-12) and five high schools (grades 10-12), The office of School Improvement provides support to this schools. Priority Non-SIG schools (50 schools) include 14 high schools with a three-year adjusted cohort graduation rate of less than 50%, and 36 schools with low proficiency and lack of progress receive support from the School Transformation Unit (UTE). Priority SIG school classification is determined beginning with school year 2013-2014 (first year implementation Cohort 2).

All priority schools fully implemented their interventions in the 2014-2015 school year. Interventions for SIG priority schools began in 2013-2014. Twenty-two cohort II SIG schools began implementation of the Transformation Model during the 2013-2014 school year. These twenty-two 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. Non SIG priority schools began in 2014-2015 with eligibility for exiting priority status at the end of 2016-2017.

Twenty-five (25) of the original twenty-eight cohort I SIG schools are being served in school year 2014-2015 as Priority Non SIG schools. The twenty-five (25) non-SIG priority schools were identified based on the definition of the classification: graduation rate of less than 60% or academic achievement in the lowest five percent (5%) in the PPAA results. These schools will remain in the priority category for at least three years and will be eligible for exiting priority status at the end of the 2016-2017 school year.

Priority schools 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 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. SIG cohort schools that exit in the 2015-16 will be evaluated using the above stated criteria in order to determine if they have met the exit requirements.

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

Table 2 is included as Attachment 9

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

Interventions for Priority Schools

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. There is no distinction between SIG and non-SIG priority transformation model requirements. PRDE is implementing SIG transformation model in all priority schools including SIG and non-SIG schools. The interventions in priority schools satisfy the turnaround principles as defined in the USDE document entitled ESEA Flexibility.

School Level Plans

All priority schools have a PCEA. The Office of Academic Affairs provides guidance and training to the school Districts, so that they can assist the priority schools when drafting their PCEA. Priority school PCEAs emphasize analysis of student need data to determine the interventions necessary to realize the Turnaround Interventions outlined below. These interventions are differentiated depending on the specific needs of the priority schools.

Priority schools will have support from Central and district level staff throughout the process of revising their PCEA. 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 school improvement plan (School Transformation Plan (PTE) in Priority SIG schools and School Intervention Plan (PIE) in Priority Non-SIG schools). Additional assistance on the development of the school intervention plan is provided by the School Improvement Office in Priority SIG Schools and by the School Transformation Unit in Priority Non-SIG schools. Such assistance may include ensuring the alignment of proposed interventions with school needs and integrating other system-wide curriculum and development efforts in their intervention plans.

Interventions

All priority non SIG schools must implement Turnaround Interventions and SIG schools follow the requirements set forth in the SIG final requirements and priority non sig work with the *Red de Apoyo Diferenciado* (Network of Differentiated Support/RAD described below). These interventions are:

Turnaround Interventions

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

Priority school directors were replaced in accordance with the requirements of the transformation model. PRDE replaced school directors in SIG schools at the beginning of its implementation in school year 2013-2014. At the beginning of school year 2014-2015, priority Non-SIG school directors were replaced (except school directors that had demonstrated progress and those from cohort 1 SIG schools).

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.

PRDE seeks to place school directors that are transformation agents in its priority schools. Effective leadership begins with extensive knowledge of the factors that define the instructional environment: individual student needs, strengths and weaknesses of staff members, aspects of the instructional programs, student data, and schedules. To support the development of effective school leadership in priority schools, PRDE implements several initiatives.

- PRDE has established an alliance with The Universidad del Este (UNE) under the School Leadership Program of the United States Department of Education and created the **Project Leader Institute**. This institute provides professional development for principals whose schools are in poor academic achievement in and need to be transformed. This project has a duration of five years and includes sessions promote dialogue and reflection and mentoring and "coaching" for all participants.
- PRDE's Professional Development Institute has also established a program of **Educational Leadership**. The curriculum in this program is designed to meet the needs of school directors with less than one year experience. These school directors meet twice a month during the first semester and are provided with intensive training in teaching, administrative and fiscal management. They also receive support in strategies for helping teachers to become effective and efficient leaders. Key focus areas in this program include educational leadership strategies, strategies to bring about change in school and transformation, teamwork, management and

conflict resolution, implementing public policy, effective teaching practices and supervision skills.

In addition, priority school director's leadership skills are strengthened through a combination of formal and informal processes that include mentoring/coaching at the school level, work based and experiential learning, peer support, networking providing a system of support for developing instructional leadership. Staff from the Office of School Improvement (OME) and the Office of School Transformation (UTE) meet monthly with school directors and District personnel to provide professional development aimed at standardizing the policies and procedures and discuss the progress of program objectives. In these monthly meetings, expert presenters provide basic understandings, teaching key concepts, and allowing practice of some useful skills to deepen the understanding of the turnaround principles. These sessions also help ensure priority school principals are provided with professional development to ensure they understand federal requirements and the academic growth expectations in their schools.

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 and the School Transformation Unit 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 include:

- providing differentiated support and resources for 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 benefit from funding flexibilities; including 1003(a), 1003(g) 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 in that section, 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 through observation of classroom practices, in-class coaching, mentoring, provision of structured common planning time, and consultation with external experts. These decisions of which supports are needed 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 school and District and involve close collaboration with the Central Level staff. This approach is consistent with PRDE's internal organization

In order to ensure that job-embedded professional development occurs and that the development is tied to teacher and student needs, priority 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 the school's PCEA and school improvement plans. Schools must also ensure that appropriate resources are provided to redesign the master schedule to allow for professional development opportunities to 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

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. Priority schools incorporate in their schools' PCEA and improvement plans an organizational plan including the increased learning time schedule of approximately 300 hours a year. Each school, depending upon identified needs and student interests create its own increased learning time plan. Schools select "Bell to Bell" instruction, before and after school programs, Saturday classes and summer programs. All increased learning time activities are available to a hundred percent (100%) of the students in each school.

Furthermore, all Priority schools are required to include in their PCEA and school improvement plans strategies they will use to increase community involvement. Schools have applied different strategies and designed different activities to foster effective communication and integration of parents and school community. These decisions are informed by results from the perception survey completed by parents, teachers and students in each school that gathered input on how to increase the family involvement in the academic processes. The survey aims to gather accurate and reliable data in order to develop meaningful and engaging practices, activities and norms that promote the learning and positive social, emotional, ethical and civic development of students, enhance engagement in teaching and learning, and reengage parents and community. The surveys include four (4) categories of analysis: commitment to school, parent and community engagement, increasing academic achievement, and school climate and social emotional factors. Survey results are used to complete the community Integration plan.

In order to support parent and community engagement each priority school must develop an alliance with at least one community organization that will help that will help with the effective integration with parents and guardians. These partnerships support open, constructive and responsible participation of those involved in the education process.

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. Selected improvement strategies must be designed to address a specific need or needs identified through the needs assessment. In order to implement these strategies, the school must utilize instructional materials and practices that are aligned to state standards and consistently review data to determine the effectiveness of all instructional programs and class offerings. PRDE staff from the Office of Academic Affairs provides ongoing support and resources related to the development, dissemination and use of standards-based curricular materials. School improvement processes established at the District levels and oversight practices provided by the Office of the Undersecretary of Academic Affairs, OME and UTE ensure that schools demonstrate how they are aligning 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, schools must select improvement strategies that include differentiated 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 requires external providers to analyze local school needs and provide assistance to schools with appropriate intervention and support. They also provide 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 must strength their instructional program by

- Using performance tasks embedded in the new curriculum guides with these students
- 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
- 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
- Providing opportunities for parent and community involvement

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. Throughout Flex implementation, PRDE educators 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.

Data analysis professional development activities are conducted at each school, following baseline, mid-year, and end of year assessments. Priority SIG schools implement Data-Com conferences to receive feedback on their progress focusing on achievement and school climate. Finally, all priority schools will implement the following interventions: 1) all schools will have a data wall, 2) school directors conduct teacher observations to monitor progress, 3) surveys are distributed to teachers, students, and parents.

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.

RAD

As a result of the waiver on SES and flexibility to use 1116 (e) on a new academic strategy, PRDE created the *Red de Apoyo Diferenciado (RAD)* as a support system that ensures a sustained process of teaching and learning through the creation of a network of differentiated support. The RAD is composed of seventeen (17) groupings of schools that include Non-SIG priority and focus schools. PRDE developed an implementation guide to support implementation of the RAD.

One external service providers offer support to schools within each of the 17 groups. The service providers were selected through a competitive process (RFP). As an established requirement of the RFP, the service providers opened an office close to the schools, thereby creating a Support Center. The Support Center is used to offer additional services such as specialized consultations to the school

directors, teachers, parents and guardians, group meetings, and access to technology and instructive materials.

Each RAD helps its school prepare a School Intervention Plan (PIE). The PIE introduces strategies and additional interventions that will be implemented in the schools based on the results from the needs assessment and the input from the school community. PIEs include strategies such as extended learning time program (300 additional hours a year), job embedded professional development plan, parent and community involvement strategy, data driven decision making and incorporating technology in the classrooms. Districts are involved and provide support throughout the process of developing the PIE and ensure alignment with priority schools' PCEA.

Accomplishments

- ***PRDE has revised its Priority School Needs Assessment Process:*** Staff from the Central and District levels 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 priority school needs assessment includes indicators such as student achievement data, process data, demographic data, and perception data. District level statisticians provide school-based support to school staff for entering and interpreting data. Schools then analyze data, summarize results, use the findings to identify the appropriate targets for intervention, and establish specific goals.
- ***PRDE has established a process for pairing Priority schools and providers.*** The Office of Academic Affairs trains priority schools to make informed provider selections. Key considerations include the experience of the service provide in facilitating professional development, capacity to provide direct assistance toe the schools, expertise in desired instructional strategies, knowledge of PRDE standards, expectations, curricular maps, and capacity to meet non-academic needs. The priority schools has flexibility to select the service provider that can best serve their schools.
- ***PRDE has established and executed a reliable Request for Proposal (RFP) process.*** Interested providers submit proposals to the Office of Federal Affairs (OFA). Reviewers use a formal evaluation process to ensure providers can meet the academic needs of all students, LSP students and students with disabilities and are able to assist a school in implementing a transformation model.
- ***PRDE has formalized the process by which schools and providers work together.*** Each school community, with the service provider, adheres to the Implementation Guide PRDE created and works to develop and execute all the required elements in the PCEA and PIE. The plan templates require the clear identification strategies and differentiated interventions to assure continuous improvement. PRDE has developed protocols that must be followed by schools and providers.
- ***PRDE established an organizational unit to oversee services to Priority Schools.*** Towards the end of complying with the Flexibility Plan's requirements for Priority schools, the PRDE created the School Transformation Unit (UTE) within the Office of Academic Affairs. The UTE is tasked with ensuring PRDE provides integrated system of support that guarantees a sustained process of teaching and learning with the result being the increased academic achievement of our students in Priority schools. The unit is divided into two offices: the Office of Academic Support and the Office of Fiscal Support. Through this unit, PRDE ensures alignment between PCEAs and PIE.

Current Activities

- **The OME and UTE oversee the implementation of the RAD.** The OME and UTE manage the implementation of RAD program for the priority non-SIG schools. UTE provides technical assistance and oversight to increase the probability schools can successfully close the achievement gaps and achieve increased academic achievement of students, including special education students and those with limited Spanish proficiency (LSP). The UTE also manages a stakeholder committee that includes educators, a service provider, a District Superintendent, two school directors and two teachers to gather input and recommendations about the planning and application of the RAD program. The OME specializes in supporting priority schools' turnaround efforts.
- **RAD Implementation:** The implementation of initiatives in the priority schools is divided into phases (6 phases in SIG schools and 5 phases in priority No-Sig schools). The phases include the development of an additional diagnostic to determine the specific services required in each school. The service provider and members of the school community work to create and fulfillment of the goals established in the PCEA and PIE. The same group identifies and establishes strategies that attend to the specific reasons a school was identified as a priority.

Service providers provide professional development services (workshops, coaching, among other modalities) throughout the whole school year. In the academic area, they offer direct support to the foundational materials of mathematic, Spanish, English, and Science. By developing interventions to increase the expected domains by grade, they will help increase students' academic achievement and close the achievement gaps between students of each school. Providers also offer administrative and operational management support of the by providing tools to the school staff to help them perform their jobs in the most efficient manner.

Service providers and school directors meet with the school Districts to ensure articulation between the selected strategies and the public policy established by the PRDE. The Academic Facilitators from Districts also visit schools and teachers to ensure high quality and appropriate of the educational interventions of the schools.

- **Conduct Ongoing Progress Monitoring.** Service providers collect and analyze data in order demonstrate they are meeting their stated objectives to improve indicators for priority schools. To this same end, they use data to show they are implementing reasonable and valid solutions that are designed to attend to the schools' needs and the support of the school community,

Throughout the school year, staff from OME and UTE evaluate the services received at school to measure delivery of service and progress. This oversight is realized through the use of an online platform called the Service Providers Platform (SSP). The SSP was developed by PRDE for the administration of external providers' contracted services, allows for systematic and computerized management. The SSP is used to translate the services rendered at the schools into measurable and reportable data, therefore, translating the transformation of these schools into concrete results. It presents a simple and organized service plan, with specific indicators that can be used to measure the academic and related progress realized in schools.

The SSP is also used to ensure fiscal and contractual compliance. The activities in the service plan are uploaded into the platform throughout the school's academic calendar, divided by phases and weeks in coordination with the invoice calendar. Staff from the Office of Federal Affairs works with staff from UTE and OME to ensure that all services specified in the system are in alignment with the school plans.

Ongoing Use of Dashboard: PRDE uses its dashboard system to monitor changes in academic achievement throughout the school year. The dashboard, as described previously, allows for the tracking of progress on 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 indicators selected by the PRDE are consistent with the list of indicators that USDE provides States that need to report on the effectiveness of SIG programs. The selected indicators correspond to the data collected in the needs assessment.

- 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

The Office of Academic Affairs provides supervision to guarantee that priority schools' intervention plans are appropriately developed and aligned. Plans are approved if they can be reasonably expected to produce systemic change in the school. The review and approval process ensures schools have identified strategies related to school improvement planning, leadership quality improvement, educator quality improvement, professional development, curriculum alignment and pacing, parent and community involvement, and monitoring plans and processes.

The OME and UTE will continue to work with priority schools to ensure implementation of required interventions. Their efforts will focus on strengthening the implemented strategies in schools and solidifying the alliances and support systems at the school and District level necessary guarantee the sustainability of the investment and desired results. PRDE will continue evaluating the processes and ensure effectiveness.

The Office of Federal Affairs reviews District plans to ensure use of District-wide funds is appropriate and compliant with federal expectations related to priority schools. Should a District-approved plan 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.

PRDE uses new technology platforms to ensure implementation of the interventions as described above. These systems are the PCEA en Vivo, SAMA, and the SSP. Leadership from OAA and OFA are responsible for monitoring the use of these systems and ensuring that interventions are taking place and having an impact on student achievement. The Monitoring Unit in the office of Federal Affairs also conducts site visits to ensure implementation of planned activities. In the upcoming school year, the on-site monitoring will address both programmatic /academic and fiscal compliance elements simultaneously.

Through the steps outlined, PRDE believes it has developed a system of tiered support to help schools identify specific strategies and carryout meaningful improvement efforts.

- 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

PRDE believes that significant milestones are most easily observed on an annual basis due to the structure of schooling and the involved assessment systems. The following indicators of progress, which are consistent with the indicators included on PRDE's dashboard will be monitored annually for all priority schools and used to make course corrections to the priority schools PCEAs and PIEs:

- 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 progress review will help inform the school, District, and Central Level about the progress of each priority school and provide objective measures for use in modifying the school level plans.

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.

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. If planned interventions were implemented with fidelity but no change in academic achievement was realized, PRDE's Central Level staff will work with the schools to develop a new/revised PCEA and PIE. The new plan will be based on current understanding of patterns of student achievement as well as the lessons learned from the initial implementation. A review of the RAD

provider will also be conducted to determine if a new provider should be assigned. Finally, a Central Level staff person may be assigned to work directly with the school.

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.

Focus Schools

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 identifies 10% of schools as focus schools. The 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 identified 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 averaged over two years.

The number of focus schools will not exceed the 10% of all schools. 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 implemented interventions will have time to become part of the school culture and result in sustained improvements in teaching and learning. Additional schools will not be identified in this category until at least one school exits focus status. 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). 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.

A total of 146 schools have been identified as focus schools. Interventions for focus schools began in 2014-2015 with eligibility for exiting priority status at the end of 2016-2017.

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.

School Level Plans

All focus schools have a PCEA. The Office of Academic Affairs provides guidance and training to the school Districts, so that they can assist the focus schools when drafting their PCEA. Focus school PCEAs emphasize analysis of student need data to determine the interventions necessary to address the achievement gaps and/or graduation rate issues that caused the school to be identified as focus.

Focus schools then engage in additional needs assessments building on the needs assessment in its PCEA. As a result of this analysis, each school prepares a School Intervention Plan (PIE) The PIE establishes strategies and additional interventions that will be implemented in the schools based on the results from the needs assessment and input from the school community, the District and an external service provider. The PIE addresses strategies including: an extended learning time program (144 additional hours a year), job embedded professional development plan, parent and community involvement strategy, data driven decision making and incorporating technology in the classrooms. Focus schools are piloting the teacher and school director evaluation system.

The School Transformation Unit (UTE) reviews the PIE to ensure that schools have selected meaningful interventions that address the achievement gaps and/or graduation rate issues that caused the school to be identified as focus. When needed, UTE makes recommendations to schools to help ensure that the selected interventions focus on the specific needs associated with the performance of those sub groups of students who are not meeting the level of proficiency associated with higher performing groups.

Interventions

PRDE requires focus schools to select specific research-based interventions that will help address achievement gaps. By establishing such a rigorous standard for interventions, PRDE is signaling the importance of interventions that address the issues underlying poor student achievement and gaps in focus schools. It should be noted that all of the best practices recommended in support of the implementation of turnaround principles may be used to support improvement efforts in focus schools.

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:

- 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.

RAD

As a result of the waiver on SES and flexibility to use 1116 e on a new academic strategy, PRDE created the *Red de Apoyo Diferenciado (RAD)* as a support system that ensures a sustained process of teaching and learning through the creation of a network of differentiated support. The RAD is composed of seventeen (17) groupings of schools that include Non-SIG priority and focus schools. PRDE developed an implementation guide to support implementation of the RAD.

One external service providers offer support to schools within each of the 17 groups. The service providers were selected through a competitive process (RFP). As an established requirement of the RFP, the service providers opened an office close to the schools, thereby creating a Support Center. The Support Center is used to offer additional services such as specialized consultations to the school directors, teachers, parents and guardians, group meetings, and access to technology and instructive materials.

Each RAD helps its school prepare a School Intervention Plan (PIE). The PIE introduces strategies and additional interventions that will be implemented in the schools based on the results from the needs assessment and the input from the school community, the District and the service provider. School Plans address strategies including: an extended learning time program (144 additional hours a year), job embedded professional development plan, parent and community involvement strategy, data driven decision making and incorporating technology in the classrooms. Districts are involved and provide support throughout the process of developing the PIE and ensure alignment with priority schools' PCEA.

Focus schools partner with a provider to ensure that they receive support that directly addresses the issues causing the school to be identified as a focus school. PRDE will leverage the expertise of the provider to ensure that focus schools' selection of interventions are supported by relevant and appropriate data that align with expected outcomes. Focus schools' interventions are based on an analysis of achievement data. There must be evidence of alignment between identified teaching and learning needs and interventions. Focus schools' intervention must also demonstrate the capacity to result in meaningful and significant change in the school. Interventions should result in improvement in school leadership and teacher practice, use professional development strategically, align and pace curriculum and instruction, and increase parent and community involvement.

Accomplishments

- ***PRDE has revised its Focus School Needs Assessment Process:*** Focus schools conduct a needs assessment as part of their work with the RAD. Schools and providers collaboratively analyze

data, summarize results, use the findings to identify the appropriate targets for intervention, and establish specific goals.

- ***PRDE has established a process for pairing focus schools and providers.*** The Office of Academic Affairs trains priority schools to make informed provider selections. Key considerations include the experience of the service provide in facilitating professional development, capacity to provide direct assistance to the schools, expertise in desired instructional strategies, knowledge of PRDE standards, expectations, curricular maps, and capacity to meet non-academic needs. The priority schools has flexibility to select the service provider that can best serve their schools.
- ***PRDE has established and executed a reliable Request for Proposal (RFP) process.*** Interested providers submit proposals to the Office of Federal Affairs (OFA), reviewers use a formal evaluation process to ensure providers can meet the academic needs of all students and address the reasons why schools were identified as focus schools.
- ***PRDE has formalized the process by which schools and providers work together.*** Each school community, with the service provider, adheres to the Implementation Guide PRDE created and works to develop and execute all the required elements in the PCEA and PIE. The plan templates require the clear identification strategies and differentiated interventions to assure continuous improvement. PRDE has developed protocols that must be followed by schools and providers.
- ***PRDE established an organizational unit to oversee services to focus Schools.*** Towards the end of complying with the Flexibility Plan's requirements for focus schools, the PRDE created the School Transformation Unit (UTE) within the Office of Academic Affairs. The UTE is tasked with ensuring PRDE provides integrated system of support that guarantees a sustained process of teaching and learning with the result being the increased academic achievement of our students in priority schools. The unit is divided into two offices: the Office of Academic Support and the Office of Fiscal Support. Through this unit, PRDE ensures alignment between PCEAs and PIE.

Current Activities:

- ***The UTE oversees the implementation of the RAD.*** UTE provides significant attention to the needs of focus schools by making decisions and recommendations that are appropriate and consistent with practices that have proven effective in other schools. UTE ensures that focus schools' selected interventions meet the following criteria 1) there is a research base supporting its use, 2) the intervention is expected to have a differential impact such that it is likely to improve the performance of the lower performing subgroups in the school and 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. To further support these schools, UTE promotes that schools engage community leaders (including those from local foundations, businesses, universities, and other sectors of the community at-large) to work with focus schools. The UTE is responsible for offering implementation support during the school year according to what the data demonstrates is needed
- ***RAD Implementation*** Focus schools share similar components to those offered to priority schools, including the establishment of professional learning communities, the creation of a data driven decision making culture, the integration of parents and the community into the

educative process, extended day schedule with at least 144 additional hours per year and individualized professional development to attend to the most pressing issues based on evaluation while improving the teaching and learning process. In addition, in focus schools services concentrate on serving the student subgroups with the goal of closing achievement gaps among groups, paying close attention to special education students and Limited Spanish Proficiency (LSP).

The implementation of initiatives in the focus schools is divided into five phases. The phases include the development of an additional needs assessment to determine specific services required in each school. The service provider and members of the school community work to create and fulfill the goals established in the PCEA and PIE. The same group identifies and establishes strategies that attend to the specific reasons a school was identified as a focus.

Service providers provide professional development services (workshops, coaching, among other modalities) throughout the whole school year. In the academic area, they offer direct support to the foundational materials of mathematic, Spanish, English, and Science. By developing interventions to increase the expected domains by grade, they will help increase students' academic achievement and close the achievement gaps between students of each subgroup. Coaches offer direct support in the academic areas with particular emphasis on strategies for differentiating instruction. The support is to help teachers develop a deep understanding of academic contents and ability to design curricular materials that support making the content accessible to all subgroups. As part of the required services, the service providers and school directors meet with the school Districts with the goal of ensuring articulation between the selected strategies and the public policy established by the PRDE.

- ***Conduct Ongoing Progress Monitoring.*** Service providers collect and analyze data in order demonstrate they are meeting their stated objectives to improve indicators for focus schools. To this same end, they use data to show they are implementing reasonable and valid solutions that are designed to attend to the schools' needs and the support of the school community, and provide a variety of high-quality options with the goal of impacting the academic achievement of specific groups of students. At the end of each phase, the UTE evaluates the received services as a means to make improvements to the implementation.

PRDE will leverage all available instructional, curricular and human resources to provide support and oversight that helps focus schools to fully implement interventions. PRDE will ensure focus school interventions 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 professional development in focus schools is designed to satisfy the specific needs of the school and teacher. The District academic facilitators visit schools and teachers to ensure a sustainable improvement in the educational quality of focus schools.

The online platform called the Service Providers Platform (SSP) was developed by PRDE for the administration of external providers' contracted services, allows for systematic and computerized management. The SSP is used to translate the services rendered at the schools

into measurable and reportable data, therefore, translating the transformation of these schools into concrete results. It presents a simple and organized service plan, with specific indicators that can be used to measure the academic and related progress realized in schools.

The SSP is also used to ensure fiscal and contractual compliance. The activities in the service plan are uploaded into the platform throughout the school's academic calendar, divided by phases and weeks in coordination with the invoice calendar. Staff from the Office of Federal Affairs works with staff from UTE to ensure that all services specified in the system are in alignment with the school plans.

Other Supports for Focus Schools

Eclectic Models of Professional Learning Communities (MECPA)

Professional learning communities promote the active investigation and implementation of academic interventions that attend to students' needs. With the purpose of strengthening these processes in focus schools and providing a better academic service to students, the Office of Academic Affairs, in collaboration with Florida and the Islands Comprehensive Center (FLICC), has designed an eclectic model of professional learning communities (MECPA). The model is designed to strengthen the data-based academic culture with the goal of improving students' academic achievement.

MECPA also facilitates the achievement of the Flexibility Plan goals, especially Principles 1, 2, and 3. Principle 1 establishes teaching based in the rigor of standards, Principle 2 works on data-based differentiated interventions, and Principle 3 refers to the support of effective instruction and leadership. Additionally, MECPA, will facilitate the compliance with Principles 6 and 7 of radical change where it states: "establish a school environment that improves school security and discipline and attends to other non-academic factors that impact student achievement, such as social, emotional, and health needs and provide continuous mechanisms for family and community participation."

Accomplishments

- The Eclectic Model of Professional Learning Communities was created including and its implementation is supported through a Program Guide, work plan, and templates
- District personnel and focus school directors received training on the project implementation.

This project has begun as a pilot program in the 146 focus schools. Many different Districts shared very good feedback about the Model. PRDE is in the process of implementation which will be supported and receive follow up from the Office off Academic Affairs.

- 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 process for evaluating the potential exit from a focus classification that it uses with priority schools. PRDE seeks to ensure uniformity and transparency in the design of its

differentiated accountability system. It also seeks to streamline the process of performance monitoring, and make optimal use of existing human resources and procedures.

As has been indicated above, while PRDE believes that compliance and operational monitoring can be done on an annual basis. The following indicators of progress, which are consistent with the indicators included on PRDE's dashboard will be monitored annually for all focus schools and used to make course corrections to the focus schools PCEAs and PIEs:

- 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 action plan if necessary.

After three years, 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. 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 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. If planned interventions were implemented with fidelity but no change in academic achievement was realized, PRDE's Central Level staff will work with the schools to develop a new/revised PCEA and PIE. The new plan will be based on current understanding of patterns of student achievement as well as the lessons learned from the initial implementation. A review of the RAD provider will also be conducted to determine if a new provider should be assigned.

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 Academic Affairs has chosen to include all schools in its accountability system regardless of Title I status. PRDE recognizes its responsibility to ensure that all schools on the island are effective in helping students to become college and career ready. The supports outlined in this section apply to all schools, including the 18 non-Title I schools. For non-classified Title I schools, 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

School Level Plans

All other Title I schools develop a PCEA. The Office of Academic Affairs provides guidance and training to the school Districts, so that they can assist the Transition schools when drafting their PCEA. Transition schools, similar to other schools, must engage in analysis of student need data to determine the interventions necessary to improve student achievement.

Each school director develops the PCEA with his/her School Planning Committee. In order to prepare a PCEA, the team has to identify the internal and external factors preventing the school 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. Using the findings of this analysis, the team then selects data-aligned goals within the PCEA template. The team then defines objectives and activities for each of these goals.

The development of PCEAs in these schools will also be informed data from an annual self-assessment of school needs based on classroom observations and surveys of school directors, school administrators, teachers, and students. Schools will be assisted the data collection and review process by the Academic Facilitators in the District offices. After schools complete the self-assessment, they will summarize the findings and determine the areas that require intervention.

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 interventions in the PCEA. District academic facilitators who will have been trained on the use of the needs assessment will review the PCEA and action plans. The review will ensure schools' action plans demonstrate alignment between strategies and the needs assessment. Each school's PCEA is then reviewed and approved by the District

academic facilitators, the Auxiliary District Superintendent of Technical Assistant and the OFA Title I coordinator.

Schools that do not 1) meet AMOs, 2) meet graduation rates (for high schools), and 3) make progress on identified indicators will be required to modify their PCEA to include actions that will address the missed targets. 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.

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. However, the following strategies have been developed by PRDE and will be considered by all non-priority, non-focus schools as they develop their PCEA.

- Coordinate with District level staff to develop a school level professional development plan that is designed to build the capacity of the school staff, 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.
- Include 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 that promote the use of data driven decision making
- 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,
- 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. Explore the use of additional tools that facilitate delivery of the curriculum including curriculum maps or other tools that align with the PRDE Curriculum.
- 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 to leverage additional assistance necessary to meet its unique needs
- Strengthen the parental involvement component of the PCEA and related action plan by working with external providers and other technical experts to increase opportunities for parents to become more involved in the educational process.

District Level Support: The majority of support for the remaining non-categorized Title I schools will come from District personnel. District academic facilitators will provide ongoing support to non-categorized Title I schools to ensure these schools can meet the needs of LSP and SWD subgroups. Additional District-level support include:

- Reviewing and analyzing all facets of the school's operation, including the design and operation of the instructional program
- Conducting school reviews to identify recommendations for improving student performance
- 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 to improve the fidelity of implementation of PCEA activities
- Providing assistance in analyzing and revising the school's budget to ensure the school's resources are more effectively aligned and allocated to the activities that will most likely increase student academic achievement and remove the school from school improvement status

PRDE will identify the lowest achieving 5% of Title I schools based on 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. One person from Central Level in the Office of Academic Affairs will be responsible for managing this portfolio of schools. In addition, the Office of Academic Affairs will reach out to community leaders, including those from local foundations, businesses, universities, and other sectors of the community at-large, and create strategic partnership to support learning in these schools.

According to the availability of funds, PRDE will fund additional work plans that address the needs of Transition schools. Funds will be prioritized to address the needs of 150 transition schools, including schools that are in the 5% lowest academic performance, to help them improve the rigor of instruction.

Accomplishments

- Hosted an educational conference and application seminar with Dr. Grant Wiggins, the creator of the Understanding by Design model. This activity took place on the 3rd through 5th of December with 1000 participants from the Department of Education (directors, teachers, facilitators, program directors, Superintendents).
- Substitute teachers/pilot project- The objectives of the project are: 1.) Support instruction through the assignment of teachers with academic support and that each student completes the whole learning schedule even when the regular teacher is absent. ..
- In January 2015, we began a pilot project in the Mayaguez area.

Current

- School visits with pilot schools follow up and to ensure all was progressing according to the work plan.
- Monthly meetings with university officials

- Developed a new work plan based on lessons learned to provide new services in areas that were initially identified but were not covered in proposals that were received throughout the first RFP process.

PRDE will evaluate the effectiveness of these types of projects/work plans at the end of the year to determine if they should be expanded in future academic years.

As explained previously, PRDE intends to use the methodology to evaluate the progress of all 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. For Transition schools, PRDE will annually assess:

- The 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

Use of School Improvement Funds

After first providing 1003(a) funds to priority, focus, and 5 % lowest performing transition schools, PRDE seeks to make 1003(a) funding available to other Title I schools within the remaining non-categorized Title I schools..

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 through “work plans”:

- 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
- Demonstrated issues related to attendance and climate that create conditions in which effective teaching and learning cannot take place
- PCEA needs assessment indicates that the school has significant and pervasive challenges and is 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 PCEA 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 availability 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.

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. Special projects 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
- 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

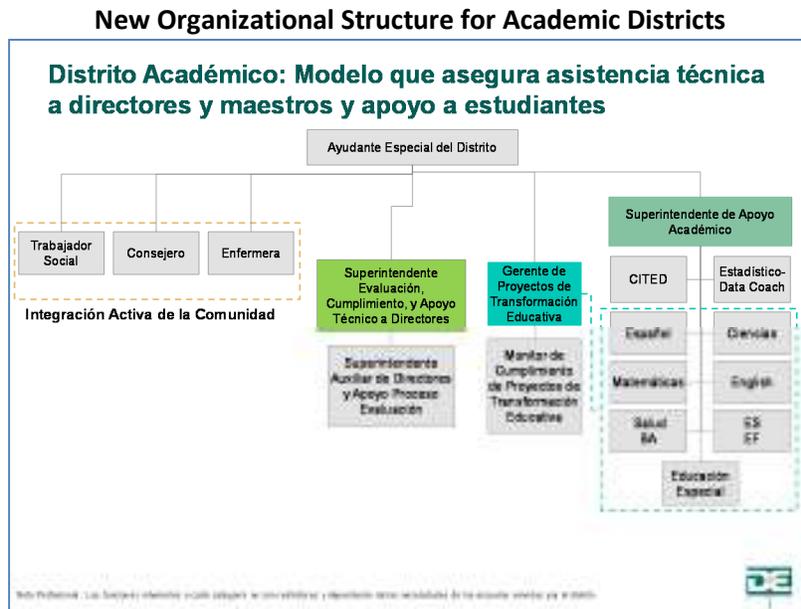
- 2.G Describe the SEA’s process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, including through:
- i. timely and comprehensive monitoring of, and technical assistance 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.

School District:

As part of an internal transformation effort to ensure that most resources are devoted to improving student achievement, the Undersecretary of Academic Affairs has designed a strengthened District model that will ensure rigorous and consistent level of academic support in all the 28 Academic Districts. This structure also provides clear roles and responsibilities at the District level to ensure accountability of the different functions.

The new District model, shown below, illustrates the main academic roles that will be implemented in the District:



The main objectives of the Academic District are to provide leadership and support to focus on student learning and achievement by supporting teachers via training, guided implementation of curriculum instruction and assessment and support in all the planning activities done at the School level. The implementation of the enhanced District model will happen during 2015.

Some of the critical roles at the District level are the following:

"Ayudante Especial de Distrito" (head of the District):

The "Ayudantes Especiales de Distrito" (Heads of the District) are responsible for developing a management plan to ensure the timely delivery of academic services to schools. Districts prioritize services to non categorized Title I schools, and offers primary interventions to Focus and Priority with the support that these schools are receiving through other service providers.

Some of the critical functions of the "Ayudantes Especiales de Distrito" are the following:

- Prepares the District work plan with support from the Academic Superintendent, the Evaluation Superintendent and team in charge of Active Integration in the Community; and supervises its implementation
- Continuously and consistently reviews District's status on academic achievement, and Teachers' and Principals' evaluations to develop improvement strategies
- Creates the PCEA committees for Schools; evaluates and approves PCEAs
- Supervises the implementation on PCEAs and ensures that the District has enough resources to conduct academic interventions based on these plans.
- Ensures implementation of new academic curricula in the District
- Implements Academic Public Policy in the District
- Ensures that Districts are complying with the State and Federal Requirements and that all efforts have the ultimate goal of improving academic achievement
- Uses District information for planning and accountability purposes
- Communicates with and divulges Information to parents and community to ensure an Academic District that is integrated to the Community
- Gives public recognition to Excellence Schools

Auxiliary Superintendent- Compliance and Technical Support for School Principals

- Offers Technical Assistance for School Principals through support with technical platforms and additional processes inherent to the Principal function
- Has in depth knowledge of the platforms and processes used by School Directors
 - SIE
 - PCEA VIVO
 - SAMA
 - Parent training
- Runs evaluation process for School Principals and supports Principals in the evaluation process for School Teachers
- Part of Committee that prepares PCEAs, offers recommendations for Schools and gives guidance and participates in the development of work plans for Schools
- Participates in the on-going progress review for Schools

- Reviews the results of academic monitoring to schools, consolidates and ensures that results are tracked and kept updated and are easy to access to ensure compliance to Federal standards
- Participates in the development of the District work plan together with the "Ayudante Especial de Distrito", the Superintendent of Academic Support, and the Community Integration Team

Superintendent of Academic Support

- Identifies development needs for School Teachers
- Participates in the design of the Work Plan of the District
- Guides implementation of curriculum instruction and assessment
- Participates in the design and implementation of intervention plans by facilitators (differentiated interventions by type of School)
- Evaluates Academic Facilitators under his/her supervision
- Shares the findings from Academic monitoring and preps Academic Facilitators so they can follow up with corrective actions
- Works with School Principals to create a visit plan for School Facilitators based on the findings from Academic Monitoring, teacher evaluations, progress against interventions detailed in PCEAs and Federal requirements
- Works, together with School Principals, in the implementation of the Academic Support System in Schools
- Identifies potential roadblocks in the design, implementation and evaluation of instructional programs
- Participates in the evaluation of educational materials, design and reviews of academic curricula
- Develops 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 (LSP support will come from resources located at a Central Level)

Academic Facilitator

- Provides 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
- Follows up on corrective actions from Teacher evaluations
- Guides and trains Teachers on standards and expectation by subject, curricula content, concepts, dexterities and processes
- Provides individualized support to teachers in curriculum implementation, teaching based on academic achievement data, and on findings from evaluations during class room visits and job-embedded intervention techniques
- Collaborates with teachers in the interpretation and analysis of standardized tests and other evaluation instruments that measure academic achievement; this helps to reorient teaching goals, strategies and teaching techniques
- Uses continuous support platforms to keep the relevant Information on their support to teachers updated
- Implements alternatives, strategies and innovative ideas in order to improve the teaching process
- Part of the PCEA Committee; supports with the intervention selection based on data
- Verifies that the Transformational Education Projects are aligned to the PCEA

- Participates in the process of defining goals and objectives of the subject program

External Support and Monitoring Evaluator

In its initial Flexibility Request, PRDE outlined a plan to engage an external evaluator that would work assessing the implementation and effectiveness of PRDE's differentiated accountability system. The vision for this contracted service was to ensure that services were delivered in PRDE's priority, focus and 5% of the schools identified within the remaining non-categorized Title I schools. Based on its implementation of ESEA Flexibility in 2014-2015 school year, PRDE has decided that the original scope of services it defined for the External Evaluator is no longer appropriate particularly because PRDE designed and implemented two new processes. First, PRDE has developed online systems that help ensure school level interventions are 1) aligned to school needs and 2) implemented with fidelity. Second, PRDE conducts an end-of-year evaluation of school performance which enables it to determine if planned interventions are having a positive impact on student achievement.

Throughout the years, PRDE leveraged services from consultants working with the Office of Federal Affairs and the Office of Academic Affairs to obtain guidance and feedback on the type of interventions schools should select for different school classifications. These consultants also provided guidance and advice regarding the management and oversight practices PRDE staff at the Central, regional and District levels should engage in to 1) better support school level efforts to improve teaching and learning and 2) automate and systemize its administrative and oversight processes

PRDE will modify the scope of the External Evaluator originally outlined in its Flexibility application and engage the services of an external consultant to provide technical assistance and performance management supports to Central and District level staff. The goal of these services is to 1) formalize the administrative and management processes PRDE uses to implement Flexibility, 2) manage and improve PRDE's capacity to collect, analyze and make decisions based on implementation data, 3) identify key areas where technical and management support is needed.

The external service provider will submit a monthly report that documents the services provided at the Central and/or District level. These reports will also include an analysis of strengths, weaknesses, opportunities and threats at the Central and/or District level. Finally, the monthly report will include recommended next steps for the subsequent month. These monthly reports will be submitted to the Office of Academic Affairs and shared with key leadership among PRDE's Central and District staff. In addition, a mid-year and end-of year report will be created.

The external service provider will also be responsible for creating tools, templates and other documents to support the execution of management functions at the Central and District levels. These tools and templates will be shared with personnel responsible for developing PRDE's suite of online tools so that the execution of administrative and management functions can be streamlined, automated, monitored and evaluated.

All of the services the external service provider offers at the Central and District levels will be consistent with all aspects of PRDE's Flexibility plan as well as island wide initiatives including the PCEA, use of data driven decision making and the District reorganization.

Review, Approval and Oversight of External Providers

UTE has designed an evaluation procedure to assess the performance of the external providers regarding the quality of services and the compliance of the requirements of the program. This evaluation process allows the analysis of the impact of the services rendered by the providers and the ability to take appropriate and timely actions regarding the necessary changes that are required in assuring the effective implementation of the school improvement plan.

The providers are responsible for the rendition of sustainable professional development throughout the entire school year. The provider establishes short and long term objective goals with the purpose of achieving a positive impact on those indicators that measure progress in the schools. In addition, they also select intervention strategies that attend to the school needs and that will be offered in the school community.

The effectiveness of the interventions will be availed when the following requirements accomplished:

- Promote data driven decision making based on all level data, attending to social, psychological and academic aspects of the school community. The use of multiple data sources to perfect instruction and improve academic achievement.
- Strengthen administrative and academic school programs, thru the integration of support services, assistance with the DEPR information systems to improve instruction, school climate, instructional leadership, evaluation practices and professional development.
- Foster transformation-educational leadership with the purpose of achieving the academic goals established by the DEPR.
- Focus on models and strategies to close gaps between students in each school.
- Knowledge transfer to the school communities, in all areas, so that schools achieve sustainability and self-management.
- Train the school community member in strategies directed to the development of partnerships and collaborative agreements.
- Integrate parents or guardians in the educational process and promote their support in achieving the participation and motivation of the students in their own learning process.
- The use of technology as an additional supporting tool for academic development.
- Provide on-going formative reports regarding the effectiveness of the interventions, in particular reports regarding student achievements, parent/community participation, attendance and student conduct/discipline.
- Support and strengthen school structures in order to improve school culture and create a propitious teaching-learning school environment.

Review and Oversight of external providers in Priority and Focus Schools

The PRDE, through the Unit of School Transformation (UTE), developed and RFP for the selection of an external evaluator to conduct an external evaluation focused in administrative, programmatic and academic compliance in the Priority Non-SIG and Focus schools that are receiving RAD services. The objective is to demonstrate that the services to attend the selected school needs are being offered with the highest standards of quality required by the DEPR. The results of the evaluation contribute to the continuous improvement of intervention in our schools and guarantee the fulfillment of the established academic strategies. In addition, this facilitates the identification of the criteria's that need to be monitored to assure the fidelity of implementation and the results of the interventions in the schools.

With this process the DEPR will be able to obtain objective data that will allow the development of necessary instruments for decision making in the design of successful strategies.

The objectives of the external evaluator of RAD are the following:

- a. Ensure that the DEPR, the Program, the school districts, the Priority Non-SIG and Focus schools, and the external providers assigned to each RAD demonstrate full compliance with the program requirements.
- b. Corroborate the technical and administrative support provided from the DEPR to these schools.
- c. Verify that the services provided by the external provider are of high quality, respond to the needs of the schools and result in an increase in academic achievement.
- d. Corroborate that all the components have the evidence and documentation necessary to demonstrate progress and quality of service.
- e. To ensure that the auto evaluation and collaboration/cooperation among the Service provider and the school are promoted, thus increasing the possibility of greater success in the processes.

The external evaluation will answer, among others, the following questions:

- a. Up to what degree of fidelity with the program is the implementation of RAD at the (a) central level, (b) Service provider, (c) district and (d) school?
- b. Up to what degree is the support among the interventions and the components of the RAD?
- c. What advancement has the RAD achieved at the District, the school and in the teacher performance and of the students?
- d. Up to what degree has the school district empowered and integrated itself in the process and grantee the supplemental Service of RAD?

The external evaluation is directed at determining if the strategies and activities are aligned with the school community needs, if they are being implemented in accordance with the PCEA and the School Intervention Plan (PIE) and if they are having a positive impact on the academic achievement of the students, reaching the execution of standards and context established by the DEPR. The services are defined in accordance with the four (4) levels of intervention that require the evaluation of the program: program at the central level, district level, Priority Non-SIG and Focus school level and the RAD external service provider level.

Evaluation of Provider Services

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.

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 a long term investment in our staff and the public education system. Once implemented, the resource allocation decisions can be expected to ensure that every school is properly supported and has the tools for success.

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 flexibly 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. As a result of the waiver those funds will be used to support educational leadership on non sig priority and focus schools.

**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; and iii. 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); and iii. 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 teachers and school directors. 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, Puerto Rico Department of Education (PRDE) has committed to enhancing, adopting, and implementing a comprehensive island-wide educator evaluation and support system. PRDE’s new educator evaluation and support system will provide an effective method of evaluating teachers and school directors and promote their continuous professional development

PRDE formalizes the support for ongoing professional growth of educators through the teacher and school directors’ evaluation system. PRDE’s evaluation system sets goals for the performance of teachers and school directors that encourages improvement in the academic performance of students. PRDE has used various strategies to raise awareness about its new evaluation and support system using

focus groups, close-ended (yes or no answers) open-ended (explain answers) surveys, orientations and stakeholders work groups. PRDE has assured the inclusion of the teachers and school directors in the development of the teacher and school director's evaluation and support system. The current version of the evaluation system was created in collaboration with various stakeholders and included involvement and participation of teachers and school directors from Puerto Rico's teacher' and school directors' representative groups. Additional stakeholders and personnel from PRDE's central, regional, and District levels also participated in the workgroups.

Puerto Rico's comprehensive teacher and school director evaluation and support system is consistent with the Principle 3 requirements of the ESEA flexibility waiver and measures performance, both with directly and indirectly. The PRDE teacher and school director evaluation and support system includes seven (7) evaluation components:

1. The use of Puerto Rico's Professional Teaching Standards (2008) and the Profile of the School Director (2014) for performance evaluation: ***This is achieved by ensuring evaluation activities are aligned with the teachers' professional standards and the school director profile as defined in public policy and other PRDE documents.***
2. The use of diagnostic, formative, and summative evaluation processes that provide information to guide and improve instruction; ***This is achieved through the use of formative observation visits, intervention visits, technical assistance, academic support visits and follow up visits.***
3. The use of a rating scale of four (4) performance levels. ***This is achieved through the use of a rating scale that uses a score of three (3) to indicate meets expectations, a score of two (2) to indicate partially meets expectations; a score of one (1) to indicate minimally meets expectations, and a score of zero (0) to indicate does not meets expectations.***
4. The use of multiple measures (standardized test and pre and post-test) of educator effectiveness that include student achievement and growth. ***This is accomplished by incorporating student growth scores into the calculation of the educator performance.***
5. Conducting evaluations according to the legal status of the employees in the agency on a regular basis with cycles that are differentiated for new and experienced educators. ***This is accomplished through the development of calendars of observation visits for the school and District levels.***
6. Providing timely feedback and specific professional development opportunities that align with the results of the observation and performance evaluations, especially for educators found to be in need of improvement. ***This is accomplished through the use of post observation meetings and the development of the Individual Professional Development Plans.***
7. Using the results of the evaluations to inform personnel decisions. The comprehensive evaluation and support system will be linked to a professional growth system that provides supports especially for teachers and school directors identified with areas in need of improvement. ***This is accomplished with the creation of Intervention Plans and Corrective Action Plans as well as through the execution of disciplinary and administrative actions as permitted under current PRDE regulations.***

Legal Framework

PRDE's original teacher and school director evaluation system requires that all teachers and school directors comply with the functions established under Law Number 149 known as *Organic Law of the Puerto Rico Department of Education* of July 15, 1999, as amended, (from now on known as Law No.

149) and the norms and regulations of the Department of Education. Under this legislation, all teachers and school directors are subject to a performance evaluation of their professional functions.

In June 2011, PRDE adopted Regulations 8035 and Regulation 8036, to include elements of an educator evaluation and support system that were not originally defined in Law No. 149. The initial adoption of these new guidelines made it possible for PRDE to begin a revision of the teacher and school director evaluation and support system. PRDE's first accomplishments in the evaluation area includes the development of new evaluation tools that were piloted in 29 cohort I SIG schools.

PRDE's current educator evaluation system based amendments to the two *Regulations cited above* (Amendment 8207 to Regulation 8036 and Amendment 8208 to Regulation 8035). These amendments outline the processes for evaluating both teachers and school directors and include additional elements of an educator evaluation and support system that were not originally defined in Law No. 149, as amended. These regulations and amendments require that PRDE's evaluation and support system is based on the Puerto Rico Department of Education professional standards for teachers and school directors [*Puerto Rico's Professional Teaching Standards (2008)* and the *Profile of the School Director*]. They also 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) establishes goals for teachers' and school directors' performance, and 4) fosters compliance among all educators with efforts to improve students' achievement and schools academic performance.

The Department of Education is currently working on a new Regulation that will include in one document the new evaluation system for the teacher and school director. This new evaluation system has been implemented as a pilot program for the past years. This regulation will repeal the current system and will establish a new process that will be aligned with the Flexibility requirements. This Regulation is projected to be in force for the start of august 2015-2016.

It should be noted that PRDE's implementation of its evaluation and support system and the decision making process will also adhere to Law No. 170 of Uniform Administrative Procedures, the *Regulation No. 6743 Teaching Staff of the Puerto Rico Department of Education*, as amended by *Regulation No. 7292* and *Regulation No. 8037*, and *Regulation No. 7565 Corrective Measures and Disciplinary Actions*.

Goals of the Evaluation System

PRDE's evaluation and support system is guided by a clear set of educator performance goals and implemented through the use of coherent, sustained, and evidenced-based learning strategies. These strategies include Research in Action, PBL, and Learning Communities, among others. Through the evaluation and support system, PRDE can regularly assess the effectiveness of educators. This evaluation system also allows PRDE to establish an efficient support system of observations, classroom visits, technical assistance, academic support and corrective plans. Through ongoing implementation of the evaluation and support system, PRDE will be able to determine the extent to which the entire support system is improving teaching and assisting all students in meeting challenging state academic achievement standards.

The goals for PRDE's educator evaluation and support system are to:

1. ***Enable educators to reflect on the results and identify ways to improve instruction.*** PRDE accomplishes this goal by providing educators with access to information about their

professional performance. Access of this information enables educators to improve their daily practice

2. **Ensure that educators are analyzing and using student performance data to inform planning of instruction.** PRDE accomplishes this goal by providing technical assistance for the process of using student achievement indicators that inform instructional planning and instructional plan development geared toward the students' learning needs. The purposeful use of achievement data throughout the school year is connected to the summative educator evaluation.
3. **Formalize educators' efforts to realize changes in their own professional practice.** PRDE accomplishes this goal through the creation of a rubric that focuses on the most critical aspects of effective professional practice and engaging educators in meaningful dialogue after each observation. The evaluation and support system establishes the expectation that educators make changes to improve their own practice and that these changes improve teaching and learning for students.
4. **Create targets for professional performance that will improve student learning.** PRDE accomplishes this goal by using a performance rating scale that effectively differentiates educators' performance level and providing Individualized Professional Development plans that respond specifically to educators' professional need. The Individual Professional Development Plans outlines high quality activities that result in changes to practice, are readily transferred into the school and classroom environments and result in improved student achievement.

In support of these goals, PRDE will:

- *Ensure the use of effective assessment methods that are continuously revised to ensure they take into account students' learning needs and inform the development of re-teaching activities.*
- *Ensure that the quality of education provided to PRDE's students uses teacher and school director evaluation result to provide the specific teaching and learning support to teachers and school directors that results in academic achievement and is differentiated according to students' learning needs.*
- *Ensure that the evaluation and support system establishes the basis for improving teaching and learning processes through effective communication with teachers and school directors using feedback and support that improves lesson planning and delivery during the entire school year.*
- *Encourage professional growth and continuous improvement of teachers and school directors through the development of Individual Professional Development Plans based on their specific needs and challenges and outlined in the summative evaluation.*
- *Ensure both the evaluators and the educators participate and contribute in the evaluation process having focus groups and other forums to obtain the opinions, recommendations and concerns of teachers about the evaluation process.*
- *Establish a clear student growth formula that links 20% of the performance of teachers and school directors to the academic achievement of students.*

Stakeholder Feedback

Over the past three (3) years, PRDE has engaged in an ongoing process of collecting feedback on their teacher and school director evaluation tools. A summary of the methods by which teacher and school directors feedback was collected and the main findings from these stakeholder engagement activities is presented below.

- **Summary of 2010-2011:** 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 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.

- **Summary of 2011-2012**: 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.
- **Summary of 2012-2013**: The evaluation cycle and instruments implemented in 2012-2013 reflected feedback collected during the previous years. During 2012-2013, PRDE implemented the evaluation rubrics through a pilot implementation in cohort I SIG schools. Data gathered from this pilot were used to enhance teacher and school director evaluation instruments and prepare for an island-wide implementation. An update of the rating scale to ensure performance levels were appropriate and to include an "exceed expectations" was conducted.
- **Summary of 2013-2014**: Evaluation experts from the Institutions of Higher Education in Puerto Rico collaborated in the development of PRDE's evaluation instruments. These experts items to be included in PRDE's initial evaluation and support system and recommended that PRDE ensure the design and construction of a valid rubric that is aligned with the National Evaluation Standards and with the Professional Standards of the Teachers for Puerto Rico. Participants' of the focus groups main concern during this year was that PRDE ensured that the evaluation process be a fair and non-punitive process and that the PRDE developed highly customized rubrics, aligned to needs, public policies and realities of the educators in Puerto Rico in order to make a fair process for everyone involve. During summer of 2013, PRDE met with school directors and special assistants to validate the evaluation cycle and review the rubrics. During the 2013-2014 school year, the implementation pilot was expanded to include all SIG schools. The initial implementation process required a lot of effort to raise awareness and understanding among educators. PRDE wanted to be sure that all participants fully understood the process.

During the 2013-2014 pilot implementation, PRDE held focus groups of teachers and school director to gather recommendations on changes to the evaluation rubric. The majority of feedback from participants focused on 1) the length of the rubric, 2) the requirements for the rating "exceeds", 3) the quantity of indicators and evidence required for each indicator. Participants also requested technical assistance from the District for teachers and school directors and clarification of PRDE's public policy to ensure alignment with the objectives of the evaluation system. Stakeholders also requested PRDE activate an Advisory Committee that would provide continuous feedback about the evaluation system.

The table below represents a summary of the performance level of teachers and school directors in the evaluation pilot implementation. Three hundred and twenty six (326) teachers and school directors from 21 school Districts were the sample group. The teachers and school directors represented four (4) core subjects from all grade levels. Orientations were given in all SIG schools, 98 in total (Cohort I 29 schools; Cohort II 22 schools and TIER III 47 schools). Note: the evaluation score does not include the 20% academic achievement score. No action was taken for individuals who scored in "Did Not Comply". The pilot implementation did not supersede the public policy and regulations of the current evaluation process.

PERFORMANCE LEVEL	Results	Percentage
Exceed expectations (100% -95%)	144 of 326	44%
Complied with expectations (94-80%)	142 of 326	43%
Partially comply (79% to 70%)	32 of 326 directors	10%
Did not comply (69% to 0 %)	8 of 326 directors	.02%

The table below represents a summary of the pilot implementation with School Directors. School directors of SIG schools were evaluated by District personnel. The data set includes 44 school directors from across 17 Districts. Note, the evaluation score does not include the 20% academic achievement score. No action was taken for individuals who scored “Did Not Comply”.

PERFORMANCE LEVEL	Results	Percentage
Excellent (100% -90%)	29 of 44 directors	66%
Good (89-80%)	5 of 44 directors	11%
Average (79% to 70%)	7 of 44 directors	11%
Below average (69% to 60%)	2 of 44 directors	.05%
Deficient (59% to 0%)	1 of 44 directors	.02%

Summary of 2014-2015: After an analysis of the 2013-2014 pilot data, PRDE decided to increase the sample of participating schools for the school year 2014-2015 to 281 schools across the island. The PRDE evaluation unit completed the process of information dissemination and orientation to all the participants in the pilot, including the 28 Districts, Auxiliary Secretariat of Special Education and Auxiliary Secretariat of Technical and Occupational Education. Also, participants (teachers and school directors) completed a self-evaluation process. Currently, District staff and school directors are conducting visits aligned to the needs and findings identified in self-evaluation and observation visits. Central Level staff provide technical assistance and support is given to participants as required according to the evaluation instrument.

In an ongoing effort to gather stakeholder feedback, PRDE continues to hold regular meetings and focus groups and monthly Advisory Committee meetings. An online and paper survey was designed and released in March 2015 (island wide). PRDE also receives continuous feedback from Central Level program directors, regional directors, District special assistants, auxiliary Superintendents, academic facilitators, and school directors during monthly meetings. Recommendations regarding the evaluation system were collected from teachers and school directors and tabulated by the PRDE Central Level staff. The most relevant recommendations of teachers and school directors were: 1) the rubric is too long, 2) the evaluation cycle is too lengthy and needs to be divided into cycles, phases and steps 3) evidence requirements are too lengthy and repetitive, 4) the need for an automated system that will capture and report evaluation results and ensure continuous feedback is provided to participants. To address these concerns PRDE’s evaluation unit is working to reduce the quantity of indicators in the rubric, create a system for scheduling observations that ensure the cycle is more clear and easier to understand, revise the evidence requirements of the evaluation rubric, In planning for future implementation, PRDE recognizes a significant need for increased communication and training for the new evaluation system.

The following table establishes the number of visits of the implementation process of the pilot 2014-2015, as of February 2015.

Position	Quantity	Number of Visits
School Directors	281	281
Teachers	5,482	4,100

As part of the follow up to the Evaluation and Support System Pilot, a sample of 15 schools and 125 teachers were selected in February 2015. These teachers received a survey of twelve (12) questions, (11) eleven close questions and one open space to state comments regarding the evaluation cycle. The following is a summary of the results obtained:

1) The 98% of the participants received orientation about the evaluation cycle.
2) The 92% of the participants completed the self-evaluation cycle.
3) The 86% of the participants received a post-observation visit from their school directors.
4) The 94% of the participants who completed the self-evaluation discussed it with their school directors.
5) The 92% of the participants received observation visits from the school director, the academic facilitator or both.
6) As the date of the survey the 34% of the participants received support from District personnel.
7) The 56% of participants received feedback after support visits.
8) The 74% of the participants received follow up visits from School Director and or Academic Facilitator.
9) The 93% of the participants received orientation about performance levels of the evaluation system and the scope of each one.
10) The 89% of the participants stated to have knowledge about how the summative evaluation is completed.
11) The 82% of the participants received orientation about how the Professional Development Plan will be completed.
12) The 13% of the participants got comments

Implementation

PRDE is administering new State Assessments during the 2014–2015 school year, and is requesting one additional year to incorporate student growth based on these assessments, we will:

PRDE will implement teacher and principal evaluation systems using multiple measures, and we will calculate student growth data based on State assessments administered during the 2014–2015 school year for all teachers of tested grades and subjects and principals; and

PRDE will also ensure that each teacher of a tested grade and subject and all principals will receive their student growth data based on State assessments administered during the 2014–2015 school year.

PRDE plan to implement its evaluation system as follows:

2015-2016: We will ensure that the implementation of teacher and principal evaluation will use multiple measure. We will provide to the teacher and principal their student growth data from 2014-2015 year, that will be the first new State Assessment administration. This will be as established in the P3 assurances.

2016-2017: Full implementation of the evaluation system for all educators using results from both the PPAA/PPEA as well as pre/post; ratings will be considered in personnel decisions. Educators who not meet basic performance expectations will be required to develop Professional Improvement Plans. The two year timeline for future personnel decisions will begin at the end of this school year. These decisions will be made at the end of the 2018-2019 school year.

2017-2018: Second year of full implementation of the evaluation system for all educators using results from both the PPAA/PPEA as well as pre/post; ratings will be considered in personnel decisions. Educators who not meet basic performance expectations will be required to develop Professional Improvement Plans. The two year timeline for future personnel decisions will begin at the end of this school year. These decisions will be made at the end of the 2019-2020 school year. This also represents the first year for the teacher that required in 2016-2017 the professional Improvement Plan.

2018-2019: Third year of full implementation of the evaluation system for all educators using results from both the PPAA/PPEA as well as pre/post; ratings will be considered in personnel decisions. Educators who not meet basic performance expectations will be required to develop Professional Improvement Plans. The two year timeline for future personnel decisions will begin at the end of this school year. These decisions will be made at the end of the 2019-2020 school year. Any educator that has not evidenced improvement based on their rating from the 2016-2017 school year will be subject to personnel action.

PRDE plan to fully implement the evaluation and support system as established in the **Principle 3 Assurances**. As has been previously indicated, educators who meet with the basic performance expectations at the end of this school year will be required to develop Professional Growth Plans, with a duration of one (1) year. Educators who does not meet with the basic performance expectations at the end of this school year will be required to develop Professional Improvement Plans, with a duration of two (2) years. The two (2) year timeline for future personnel decisions will begin at the end of the 2016-2017 the school year. Any educator that has not evidenced improvement based on their rating from the 2016-2017 school year will be subject to personnel action in 2018-2019.

During the implementation PRDE will carry on a work plan that include the following efforts and activities:

- Districts staff will give support, technical assistance and follow up to schools in order to assure implementation and overcome situations and issues.
- All the support and visits will be recorded and update on Support and Academic Monitoring (Sistema de Apoyo y Monitoria Académica, SAMA for its acronym in Spanish).
- PRDE Evaluation Unit will collaborate with the Communication Office and hold meetings at the beginning of the school year with the groups that represent teachers and school directors, to present the work plans and receive feedback from the participants and a debriefing meeting at the end of the school year.

- PRDE webpage will have a link with all the information related to the evaluation system.

Evaluation and Support System Framework

PRDE used current research, guidance from evaluation experts (key PRDE personnel, university and nationally recognized in the area of evaluation, professional development experts and private sector representatives), input from stakeholders (teachers and school directors representatives organizations, parents representative, special education parents representative, classroom teachers and school directors) and administrative guidelines, to design its evaluation and support system framework and developed an evaluation system that ensures:

1. The evaluation system has a clearly defined set of performance expectations and stakeholders are made aware of these expectations through annual orientations in schools and Districts.
2. The performance expectations are clearly reflected in the evaluation instrument and information about the evaluation cycle, criteria and rating scales are easy to understand and readily accessible to educators.
3. Data will be collected through observation, findings and recommendations will be documented and monitored.
4. Educators have opportunities to help educators improve their performance during the evaluation cycle and that multiple opportunities for observation will be provided.
5. Educators receive a summative evaluation meeting to close the evaluation cycle. The summative evaluation meeting is a formal process similar to an exit conference during which the results of the summative evaluation are made to school directors and teachers. At the end of this point the evaluator will complete 80% of the evaluation process.

The Evaluation Rubric

The current version of the teacher and school director evaluation tool was created in collaboration with various stakeholders including Puerto Rico's teacher' and school directors' representative groups. Please see the Stakeholder Feedback section for additional information.

PRDE's teacher and school directors' evaluation rubric is consistent with the 2008 Puerto Rico Professional Standards for Teachers and the Profile of the School Director, which are based on the National Board for Professional Teachers Standards (NBPTS) and the Interstate New Teacher Assessment and Support Consortium. The Puerto Rico Professional Teaching Standards (2008) and the Profile of the School Director establish a set of knowledge, skills, and attributes expected of PRDE teachers and school directors.

PRDE's teachers' evaluation system defines professional practices and outlines the essential criteria and elements of practice within four (4) separate categories. PRDE's teachers' evaluation rubric has twenty six (26) indicators that defines professional practices and outlines the essential criteria and elements of practice within three (3) separate categories.

These categories, in addition to the 20% of the student achievement, are:

- A. Teaching and Learning,
 - i. Learning and curriculum planning (5 indicators)
 - ii. Teaching and learning process (6 indicators)
 - iii. Learning evaluation (5 indicators)
 - iv. Classroom organization (1 indicator)
- B. Professional Development (3 indicators) and,

C. Obligations and Responsibilities (6 indicators).

The evaluation instrument is organized into three (3) major evaluation domains: (a) teaching and learning, (b) professional development tied to teacher performance, and (c) duties and responsibilities of teachers.

The performance indicators in each of these areas are intended to focus educators' attention on meeting the diverse needs of their students, to develop an increased understanding of the diversity of their students, to identify students' unique needs, develop differentiated instructional strategies to meet those needs, and continually utilize data of their performance to make decisions and assess the effectiveness of their strategies to improve the academic achievement of students. (See Appendix for a list of these performance indicators).

The school directors' evaluation rubric has twenty (20) indicators, PRDE defines professional practices and outlines the essential criteria and elements of practice within three (3) separate categories. These categories, in addition to the 20% of the student achievement, are:

- A. School director as instructional leader and analyst of academic achievement (9 indicators),
- B. School director as administrator (7 indicators), and
- C. Organizational and ethical performance (4 indicators).

PRDE will use these criteria to assess and support student achievement by evaluating educators' current practices and identifying ways to support professional growth that includes measures of student growth.

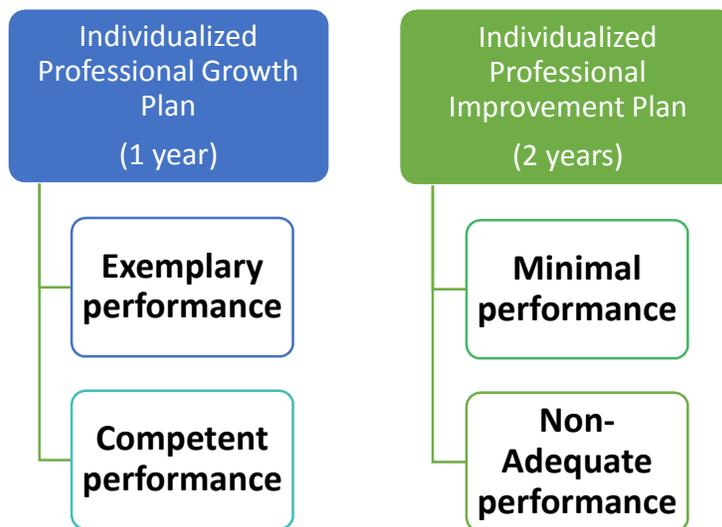
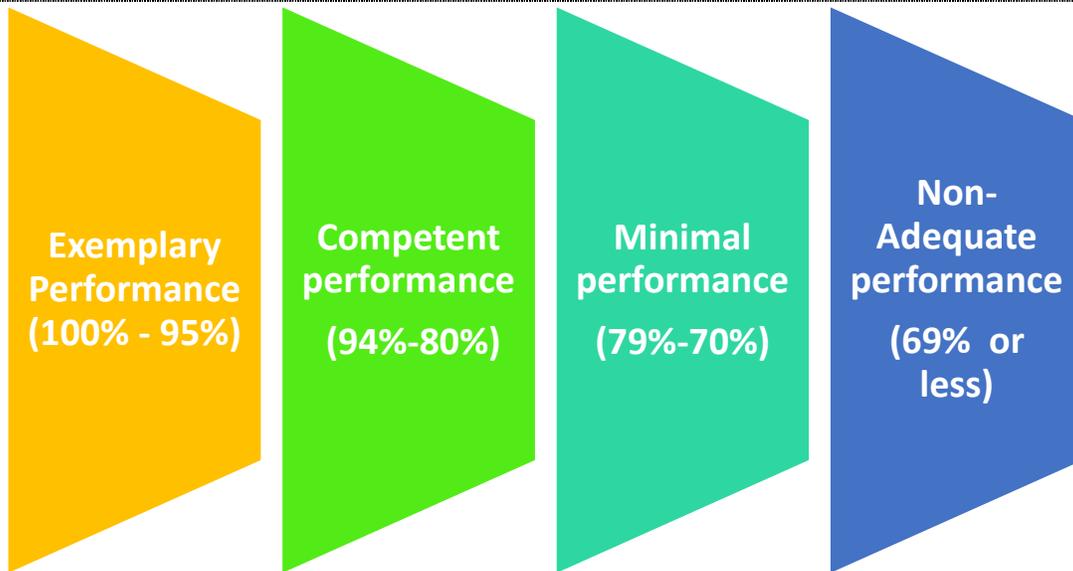
The teacher and school director evaluation rubric has a 100 point scale and a three (3) and zero (0) indicator score. A score of three (3) indicates that the teachers and school directors meet expectations. A score of two (2) indicates that the teachers and school directors partially meet expectations. A score of one (1) indicates that the teachers and school directors minimally meet expectations. A score of zero (0) indicates that the teachers and school directors do not meet expectations.

Pre-Defined Performance Levels for Teachers and School Directors

PRDE's evaluation and support system is designed to ensure ongoing professional development of educators and enrich the quality of teaching and learning in public schools. PRDE believes that the four (4) performance levels it has defined will benefit the academic achievement of Puerto Rico's public school students. The four (4) pre-defined performance level for teachers and school directors are:

- 1) **Exemplary:** Scores between 100% and 95%, demonstrate fully domain of effective instructional behaviors and practices.
 - The PRDE will encourage these teachers and school directors to participate in professional development activities and serve as mentors to peers. In addition, if funds are available, teachers and school directors will be rewarded or be given incentives to make additional meaningful contributions to PRDE's evaluation system by supporting the disseminating of information of their effective practices to peers.
 - The PRDE require these teachers and school directors to participate in professional development and include in the development of their one (1) year **Individualized Professional Growth Plan**.

- 2) **Competent:** Scores between 94% to 80%, demonstrates an adequate level of professional performance of the expectations for each criteria of the evaluation.
- A teacher and school director with “competent” score is performing the responsibilities associated with the teaching and school director role; however, their overall performance is not exceptional and can be improved.
 - The PRDE will require these teachers and school directors to participate in professional development and include it in the development of their one (1) year **Individualized Professional Growth Plans**.
 - PRDE will provide these teachers and school directors the option of partnering with teachers or school directors in their school or District that have been identified as exemplary teachers and school directors, for mentoring other teachers and school directors.
- 3) **Minimal:** Scores between 79% to 70%, does not demonstrate the professional performance to consistently satisfy the expectations of the evaluation criteria.
- Teachers and school directors with minimal scores have some deficiencies that influence their ability to demonstrate a wide spectrum of effective instructional behaviors; however, these deficiencies can be remediated.
 - PRDE will require these teachers and school directors to develop a two (2) year **Individualized Professional Improvement Plan** that specifies individualized professional development activities that correspond to the observed performance weakness and opportunity areas for professional development growth. PRDE will set scheduled performance interventions to track the individual progress toward improving their instructional practice.
- 4) **Non-Adequate:** Scores less than 69%, demonstrates significant deficiencies in the expectations for each factor included in the evaluation system.
- Teachers and school directors with adequate scoring lack critical skills and abilities necessary to be an effective teacher or school director and these deficiencies significantly affect the teacher’s or school director’s ability to execute their professional teaching and school directors roles and responsibilities.
 - PRDE will require these teachers and school directors to develop a two (2) year **Individualized Professional Improvement Plan** that specifies an integrated and comprehensive set of professional development activities that correspond to both global and specific performance weaknesses and growth opportunity areas. PRDE will set quarterly performance expectations for these teachers and school directors to track individual progress toward improving their instructional practice.



Frequency of observations assessment of Teachers and School Directors

The frequency of the evaluations will occur as follows:

- New teachers and new school directors (1st year in PRDE) will be evaluated annually and enrolled in an Induction Process to receive special attention and support from the PRDE staff and assure the best performance results.
- Teachers or School Directors with temporary status or probatory, non- tenured teachers or school directors and teachers enrolled in the Teachers’ Career Ladder will be evaluated annually with the entire evaluation cycle visits and steps. An Individual Professional Development Plan must be develop by these teachers and school directors annually.

- Tenured Teachers and School Directors
 - 1) First (1st) year of the implementation of the evaluation system
 - All tenured teachers and school directors will be evaluated with the entire evaluation cycle visits and steps and they must develop an Individual Professional Development Plan depending on their performance level.
 - 2) Second (2nd.) and Third (3rd) year of the implementation of the evaluation system
 - **Exemplary and Competent Performance Teachers and School Directors** – Will develop an annual Individual Professional Growth Plan and will receive a formative observation visit annually, and a summative evaluation every two (2) years.

Minimal and Non Adequate Teachers and School Directors–Will develop a two (2) year Individual Professional Improvement Plan with support from the school director or the District staff and will have a complete evaluation cycle visits and steps each year to revise progress, improvement and increased effectiveness. After two (2) years with a minimal or non-adequate performance rating, a teacher and school director will be referred to the PRDE Legal Division and Human Resources.

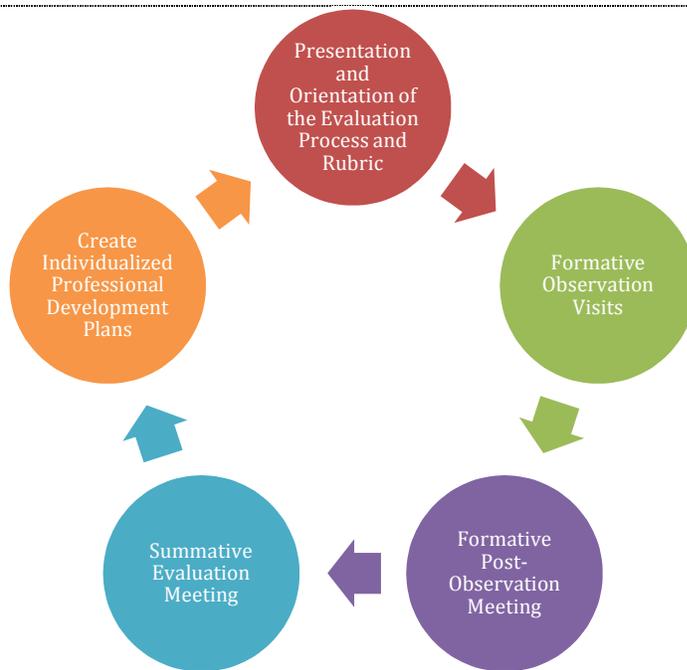
Teachers Evaluation Cycle

1. Presentation and Orientation of the Evaluation Process and the Rubric
 - Provided to teachers by the school directors with collaboration from the District staff at the professional meeting held during the first days of work at the beginning of the school year.
 - The purpose of this is to discuss with the teachers the evaluation cycle, to discuss the evaluation tools and rubric, and to clarify any concerns or doubts of the impending evaluation process.
 - During the presentation and orientation, the teachers will receive the observation and visit schedules for the entire school year.
2. Formative Observation Visits
 - According to the scheduled handed out during the orientation, the visit will be conducted by the school director with the collaboration of the District staff.
 - Purpose of these visits is to evaluate and administer the evaluation tools and rubric.
 - This observation will serve as basis for identifying strengths, challenges as well as next steps for receiving academic support and technical assistance.
3. Formative Post-Observation Meeting
 - Conducted no more than five (5) days after the formative observation visit.
 - Purpose of these visits is to discuss with the teacher the observations and findings of their professional performance, providing feedback and discussing the areas for growth.
 - Follow-up visits are conducted if necessary as well as post-observation meeting.
4. Summative Evaluation Meeting
 - Will include 80% of the score in the area of teaching, professional development and obligations and responsibilities, this portion must be completed in May.

- The other 20% of the score, consisting of student growth is to be completed as soon as the results from both tested and non-tested grades are available and can be incorporated into the evaluation.
- The school director will contact the teacher to schedule and coordinate a meeting with the teacher to discuss the final results of the evaluation.
- The purpose of this meeting is to discuss the teachers' performance based on the formative observations.
- PRDE uses a Feedback Form to document the summative evaluation.
- The evaluator discusses the overall impressions of a teacher's practice based upon previously shared evidence. This meeting is intended to provide an opportunity for a deep conversation between the evaluator and the teacher. It is also a time when clarification and additional information may be provided to the teacher by the evaluator. During this meeting, the evaluator and the teacher discuss future professional development goals that support continuous professional improvement and growth
- The evaluator is encouraged to make recommendations specifically designed to improve teachers' performance.

5. Create Individualized Professional Development Plans

- Based on the results of the evaluations, **Individual Professional Development Plans** will be required.
- These plans are developed in August of the corresponding school year.
- The plans are a one (1) year Individual Professional Growth Plan for teachers scoring exemplary or competent on their evaluations or a two (2) year Individual Professional Improvement Plan for probationary and tenured teachers scoring minimal or non-adequate in their evaluation.
- The purpose of this Individual Professional Development Plans is to support meaningful personal and professional growth. The Individual Professional Development Plans answers the following questions: what teachers know, specific skills that the teachers needs to learn, what teachers' wants to develop next, and how it will be accomplished.
- Based on the evaluation results, the professional development is going to work and coordinate from the school, school Districts and PRDE academic programs whom will identify professional development priorities. The Professional Development Institute from PRDE Central Level will carry on professional development initiatives, focus on statewide aspects. They will also be in charge of support professional development activities and asses the best practices according to PRDE public policy and direct to improve the academic achievement of students.



School Director Evaluation Cycle

1. Presentation and Orientation of the Evaluation Process and the Rubric
 - Provided to school directors by the District staff with collaboration from the special assistants at the professional meeting held during the first days of work at the beginning of the school year.
 - The purpose of this is to discuss with the school directors the evaluation cycle, to discuss the evaluation tools and rubric, and to clarify any concerns or doubts of the approaching evaluation process.
 - During the presentation and orientation, the school directors will receive the observation and visit schedules for the entire school year.
2. Formative Observation Visits
 - a. According to the scheduled handed out during the orientation, the visit will be conducted by the Superintendent with the collaboration of the District staff.
 - b. Purpose of these visits is to evaluate and administer the evaluation tools and rubric.
 - c. This observation will serve as basis for identifying strengths, challenges as well as next steps for receiving academic support and technical assistance.
3. Formative Post-Observation Meeting
 - a. Conducted no more than five (5) days after the observation visit.
 - b. Purpose of these visits is to discuss with the school director the observations and findings of their professional performance, providing feedback and discussing the areas for growth.
 - c. This meeting must be completed for all school directors twenty (20) days before the school year ends.
 - d. Follow-up visits are conducted if necessary as well as post-observation meeting.

4. Summative Evaluation Meeting

- a. Will include 80% of the score in the area of school director as instructional leader and analyst of academic achievement, school director as administrator, organizational and ethical performance, this portion must be completed in May.
- b. The other 20% of the score, consisting of student growth is to be completed as soon as the results from both tested and non-tested grades available and can be incorporated into the evaluation.
- c. The District staff will contact the school director to schedule and coordinate a meeting with the school director to discuss the final results of the evaluation.
- d. The purpose of this meeting is to discuss the school directors' performance based on the formative observations.
- e. PRDE uses a Feedback Form to document the summative evaluation.
- f. The evaluator discusses the overall impressions of the school directors practice based upon previously shared evidence. This meeting is intended to provide an opportunity for a deep conversation between the evaluator and the school director. It is also a time when clarification and additional information may be provided to the school director by the evaluator. During this meeting, the evaluator and the school director discuss future professional development goals that support continuous professional improvement and growth
- g. The evaluator is encouraged to make recommendations specifically designed to improve school director's performance.

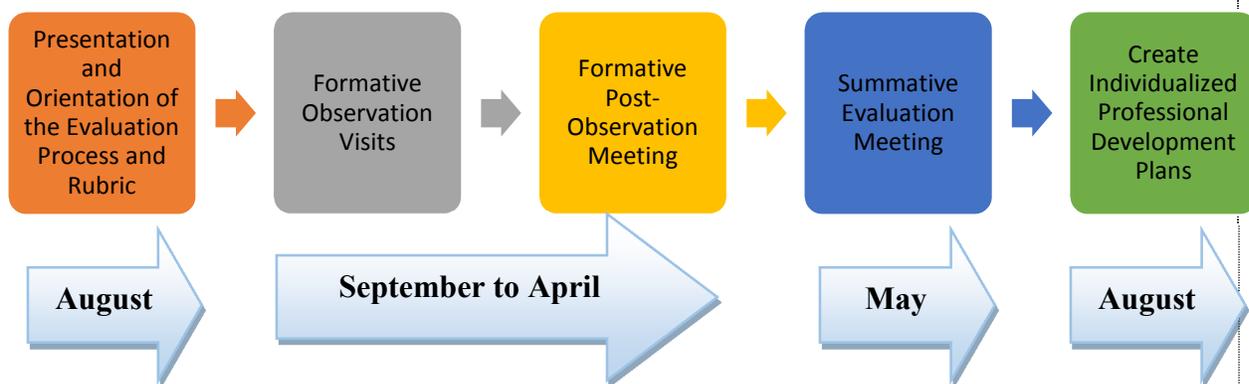
5. Create Individualized Professional Development Plans

- a. Based on the results of the evaluations, **Individual Professional Development Plans** will be required.
- b. These plans are developed in August of the corresponding school year.
- c. The plans are a one (1) year Individual Professional Growth Plan for school directors scoring exemplary or competent on their evaluations or a two (2) year Individual Professional Improvement Plan for probationary and tenured school directors scoring minimal or not adequate in their evaluation.
- d. The purpose of this Individual Professional Development Plans is to support meaningful personal and professional growth. The Individual Professional Development Plans answers the following questions: what school directors know, the specifics skills that the school directors needs to learn, what school directors wants to develop next, and how it will be accomplished.
- e. Based on the evaluation results, the professional development is going to work and coordinate from the school, school Districts and PRDE academic programs whom will identify professional development priorities. The Professional Development Institute from PRDE Central Level will carry on professional development initiatives, focus on statewide aspects. They will also be in charge of support professional development activities and asses the best practices according to PRDE public policy and direct to improve the academic achievement of students.



Actions	Description	Deadline	Person in Charge
Presentation and Orientation of the Evaluation Process and Rubric	<p>Discuss the evaluation tools and rubric.</p> <p>Clarify any concerns or doubts of the evaluation process.</p> <p>Receive the observation and visit schedule for the entire school year.</p>	First days of work at the beginning of the school year.	<p>Provided to the <u>teachers</u> by the school directors with collaboration from the district staff.</p> <p>Provided to the <u>school directors</u> by the district staff with collaboration from the special assistants.</p>
Formative Observation Visits	<p>Evaluate and administer the evaluation tools and rubric.</p> <p>Identify strengths and challenges for receiving support and technical assistance.</p>	During the school year	<p>For the <u>teachers</u>: conducted by the school director with collaboration from the district staff.</p> <p>For <u>school directors</u>: conducted by the superintendent with collaboration of the district staff.</p>
Formative Post-Observation Meeting	<p>Discuss observations and findings of their professional performance.</p> <p>Provide feedback.</p>	Conducted no more than five (5) days after the formative observation.	For the <u>teachers</u> : conducted by the school director with collaboration from the district staff.

	<p>Discuss areas of growth.</p> <p>Follow up visits are conducted if necessary.</p>		<p>For <u>school directors</u>: conducted by the superintendent with collaboration of the district staff.</p>
Summative Evaluation Meeting	<p>Discuss their performance based on the formative observation.</p> <p>Clarify and share additional information.</p>	<p>80% of the performance areas will be completed in May.</p> <p>20% of the student growth as soon as the PPAA results are available.</p>	<p>For the <u>teachers</u>: school director will contact them to schedule and coordinate a meeting to discuss the final results.</p> <p>For <u>school directors</u>: district staff will contact them to schedule and coordinate a meeting to discuss the final results.</p>
Create Individualized Professional Development Plans	<p>Based on the results of the evaluations and the performance levels.</p> <p>Purpose is to support meaningful personal and professional growth.</p>	Develop in August.	<p><u>Individual Professional Growth Plan (1 year)</u> for teachers and school directors scoring exemplary and competent on their evaluation.</p> <p><u>Individual Professional Improvement Plan (2 years)</u> for teachers and school directors scoring minimal and non-adequate on their evaluation.</p>



Present and Discuss the Evaluation Results with the Teacher and School Director and Determine a Need for Additional Support

Feedback is an integral component of an effective teacher and school director evaluation and support systems. The results of the evaluation and interventions with the teachers and school director will be shared with each teacher and school director in an official visit during the formative process either with the school director or the District staff. Teachers and school directors will receive from their school director or the District staff a summary of a) areas of strength, b) identified needs, c) areas in need of improvement, and d) recommendations that the teacher or school director must consider implementing to improve their practice, during the entire evaluation cycle in order to give them the opportunity of demonstrate improvement and comply with the summative evaluation requirements. Copy of the evaluation instrument used for the summative evaluation will also be given to the teacher and school director to inform them of the criteria and the indicators that will be used in the final evaluation.

Consistent with national trends in evaluation systems, a summative evaluation meeting with the teachers and school directors will be held at the end of the year. PRDE believes these “end of year” meetings are important and will provide educators with an opportunity to reflect on the professional growth they have realized during the course of the year. The teachers and school directors will have ten (10) days from the day of the meeting to present comments on the results of the evaluation to the evaluator. The evaluation, including the comments of the teachers and school directors, will be forwarded to the Auxiliary Secretary of Human Resources and filed with the Puerto Rico Department of Education.

Individual Copies of teachers and school directors’ evaluations will also be provided to the Office of the Undersecretary of Academic Affairs so that system-wide analysis of teacher and school director performance can be conducted. As indicated above, the teachers and school directors will develop a two (2) year Individual Professional Development Improvement Plan for the teachers and school directors that “Partially Meet” or “Do Not Meet” the expectations. The plan will indicate the professional development activities the teacher and school director will participate in to foster growth and strengthen the areas that are identified in need of improvement as indicated in the Evaluation Report and the Guide to Classroom Visits: Diagnostics, Formative/Summative forms. Copies of these professional development plans will also be provided to the Office of Academic Affairs so that the appropriate analysis of teachers’ and school directors’ professional development needs can be better understood and tracked to measure effectiveness and impact in the classroom according to the PRDE Professional Standards of Teachers and School Director Profile.

Use of Achievement Data in Teacher and School Director Evaluation

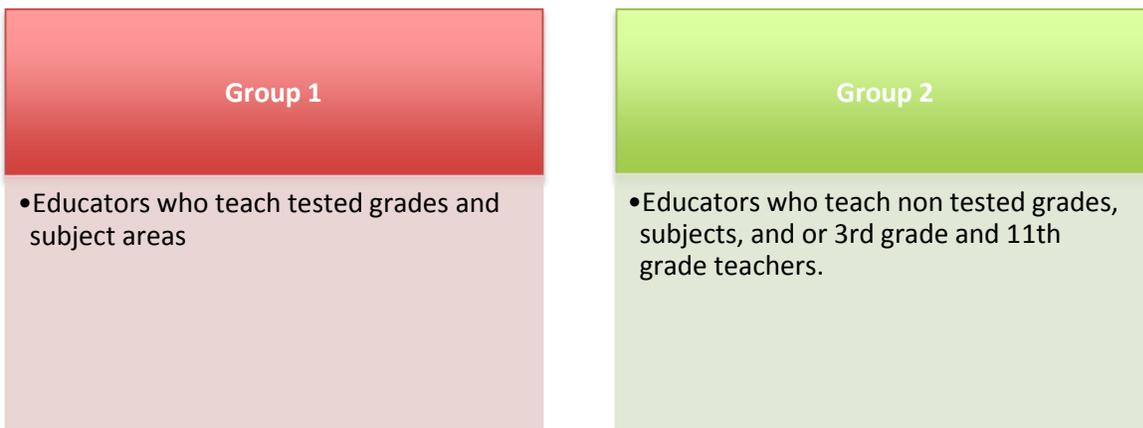
Multiple Valid Measures

PRDE's evaluation and support system *determines effectiveness using multiple measures. These measures adequately represent the scope and quality of the educator's performance and include observations by trained evaluators who have knowledge about teaching, the subject matter and the context and measures of academic achievement as determined by performance on standardized State assessments or pre/post-tests.*

Growth Model

PRDE's growth model was outlined in Principle 1. The growth model uses a Transition Matrix for both tested grades and subjects and non-tested grades and subjects. This growth model allows for student achievement data to be incorporated in a meaningful way in the evaluation of both teachers and school directors. The academic growth values defined through PRDE's Transition Matrix will be used to as inputs into the evaluation of all educators, including 1) teachers who teach multiple subjects and 2) teachers who share responsibility for LSP and SWD subgroups.

PRDE classifies educators into two groups in depending on which achievement scores are used as inputs into the teacher evaluation process. These groups are defined below:



For both tested and non-tested grades and subjects measures of student growth are “rigorous, comparable across classrooms” and “between two points in time”.

Measure A:
Performance on
PPAA & PPEA

- Determination of student growth using the Transition Matrix for either PPAA or PPEA scores

Measure B:
Content Specific Assessments

- Determination of student growth using the Transition Matrix for either pre/post tests

Scoring Results on PRDE's Teacher Evaluation Rubric

There are four (4) components in the proposed Puerto Rico Department of Education (PRDE) teacher effectiveness (TE) system:

- classroom observations
- professional development
- duties and responsibilities; and
- Student growth.

Eighty percent (80%) of the teachers' evaluation score will be based on the first three measures of teacher effectiveness, and each of those three measures has a specific weight that indicates its proportion of the 80% of the evaluation score. Twenty percent (20%) of teachers' evaluation score will be based on student achievement measures

PRDE's Technical Assistance Committee (TAC) recommended against a using scoring system that sums the results from each component each area to create an overall rating. Such an approach could produce most representative results and make it possible for high ratings one area to compensate for low ratings in another area.

1. Scores in of the four (4) evaluation components are based on an assessment of performance determined through observation and the application of standardized rubrics. Minimum and maximum points for each evaluation component have been defined and are presented in the table below
2. Weights are used to compute the final composite score to ensure that student growth accounts for 20% of the final evaluation score. The constant set of weights ensures that the computation of the teacher effectiveness scores is *compensatory* in that extremely high performance on a particular TE component can to some extent compensate for lower performance in the other areas, but also ensures that student achievement gains account for at least 20% of each teacher's score.

Category	Number of "Items"	Max Points	Weight
Teaching	5	15	
	6	18	
	5	15	
	1	3	
Teaching Subtotal	17	51	0.52
Professional Development	3	9	0.10
Duties and Responsibilities	6	18	0.18
Section Subtotal (80%)	26	78	0.80
Student Growth		18	0.20
Total		96	1.00

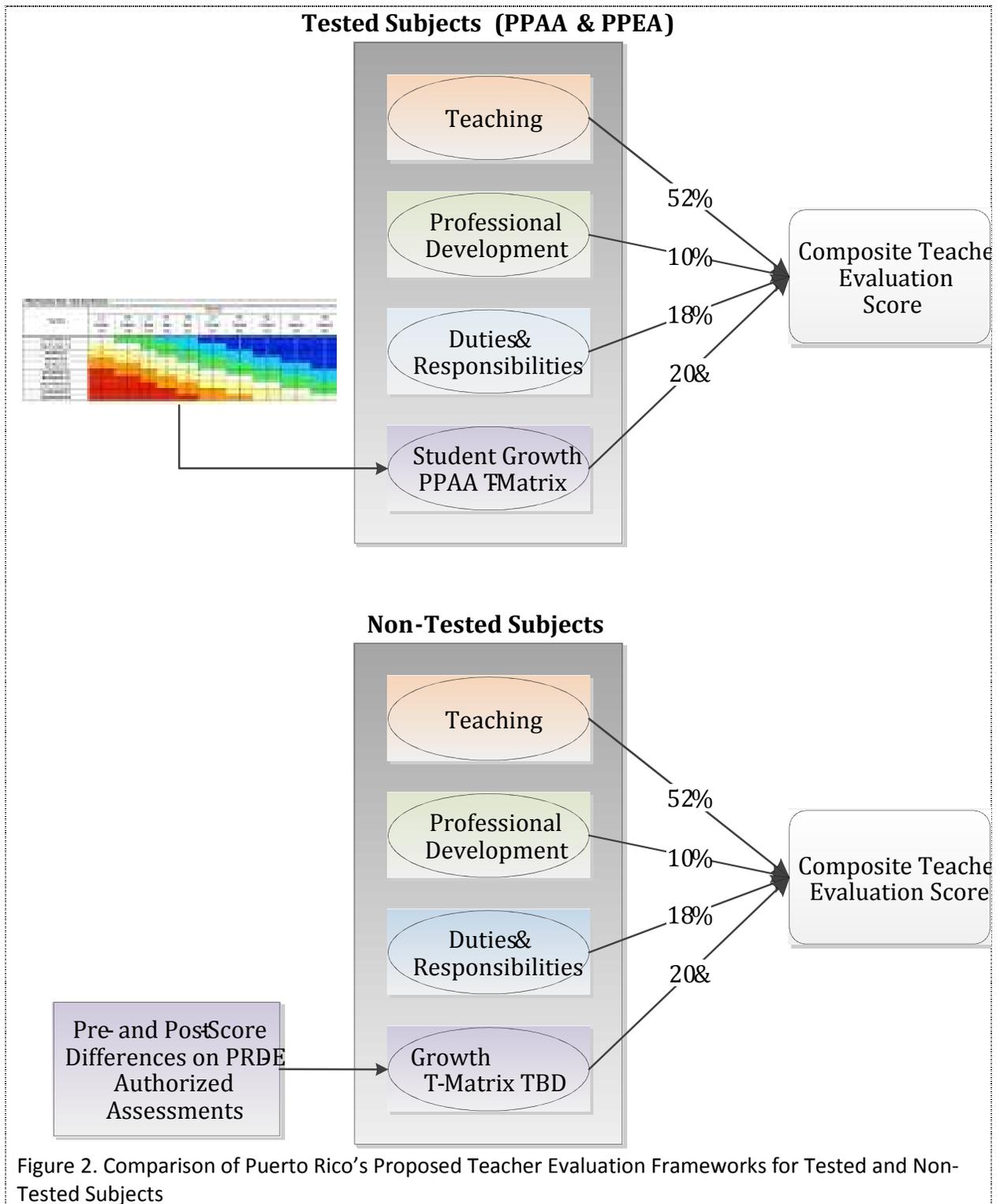
Teacher evaluation for tested and non-tested subjects will follow the same framework and weighting insofar as determining the composite teacher evaluation score. The only substantive difference is the nature of the student-growth component. For PPAA and PPEA, student growth will be based on a *transition matrix* (or T-matrix as shown in Figure 1). The T-matrix is a special case of a *decision matrix* that qualitatively differentiates the amount of observed student growth attributed to each teacher relative to the students' prior growth.

Year One	Year Two									
	Low Pre-Basic (1.1)	High Pre-Basic (1.2)	Low Basic (2.1)	Mid Basic (2.2)	High Basic (2.3)	Low Proficient (3.1)	Mid Proficient (3.2)	High Proficient (3.3)	Low Advanced (4.1)	High Advanced (4.2)
Low Pre-Basic (1.1)	0	1	2	3	4	5	6	7	8	9
High Pre-Basic (1.2)	1	2	3	4	5	6	7	8	9	10
Low Basic (2.1)	2	3	4	5	6	7	8	9	10	11
Mid Basic (2.2)	3	4	5	6	7	8	9	10	11	12
High Basic (2.3)	4	5	6	7	8	9	10	11	12	13
Low Proficient (3.1)	5	6	7	8	9	10	11	12	13	14
Mid Proficient (3.2)	6	7	8	9	10	11	12	13	14	15
High Proficient (3.3)	7	8	9	10	11	12	13	14	15	16
Low Advanced (4.1)	8	9	10	11	12	13	14	15	16	17
High Advanced (4.2)	9	10	11	12	13	14	15	16	17	18

Figure 1. Proposed Transition Matrix for PPAA and PPEA

Non-tested subjects will use a similar T-matrix, based on differences between pre- and post-performance on PRDE-authorized assessments. As described in Principle 1, Requests for Quote (RFQs) are currently being developed to select a potential vendor to provide the pre- post assessments.

The comparability between the teacher evaluation models for tested and non-tested subjects is shown in Figure 2. Student growth is considered equivalently for the tested and non-tested subjects. The only difference is the nature of the actual student growth assessments and the T-matrix used. This transition matrix for PPAA and PPEA will be used for teacher and school directors. Both have the same structures, PLDs and subgroups.



Scoring Results on PRDE’s School Director Evaluation Rubric

There are four (4) components in the proposed Puerto Rico Department of Education (PRDE) school director effectiveness:

- the school director as instructional leader and analyst of academic achievement
- the school director as administrator
- organizational and ethical performance
- Student growth.

Eighty percent (80%) of the school director evaluation score will be based on the first three measures of, and each of those three measures has a specific weight that indicates its proportion of the 80% of the evaluation score. Twenty percent (20%) of school director evaluation score will be based on student achievement measures, according to the results of the PPAA and PPEA.

Category	Number of “Items”	Max Points	Weight
The School Director as Instructional Leader and Analyst of Academic Achievement	9	27	.036
The School Director as Administrator	7	21	.028
Organizational and Ethical Performance	4	12	.016
Section Subtotal (80%)	20	60	.080
Student Growth		15	.020
Total		75	100

Student growth will be based on a *transition matrix*. The T-matrix is a special case of a *decision matrix* that qualitatively differentiates the amount of observed student growth attributed to each school director’s relative to the students’ prior growth. To calculate the director growth it will be the same value table as we calculate the teacher.

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 and school directors to professional development courses, 2) determining eligibility for performance awards/incentives (subject to availability of funds), 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, and 5) assignment of a mentor to offer technical assistance.

Outputs of PRDE evaluation and support 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

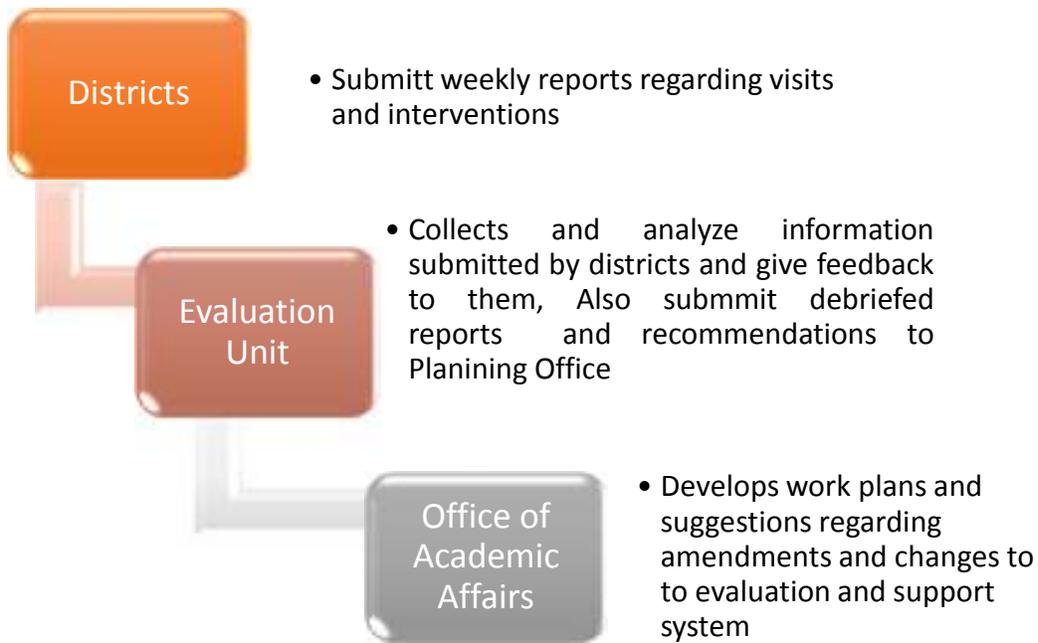
direct impact on students. PRDE is currently evaluating its policy and regulatory framework to identify any changes that may be needed and related to the evaluation and support system.

PRDE will forward results from educators' evaluations, to the Legal Division, 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 will forward copies of educator evaluations to the Office 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. The Evaluation Unit 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 and support 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.

Monitoring/Oversight of Implementation

Through District personnel weekly reports to the evaluation unit of the PRDE Central Level staff will monitor to ensure that the evaluation and support system is being implemented as intended. This will be done by the Support and Academic Monitoring (Sistema de Apoyo y Monitoria Académica, SAMA for its acronym in Spanish) to the School Authentic Comprehensive Plan Guide to the Comprehensive Plan Authentic School (PCEA) that was established to provide school directors and District and Central Level staff the appropriate tools to ensure compliance of interventions. The compliance office, the Evaluation Unit and the Office of Academic Affairs will follow up this monitoring process. In addition to simplifying the process, make observations and changes in the electronic platform, this tool allows schools, District and regions to present evidence of interventions, resource schedule of visits, document tracking, training, support, evaluation, records management compliance and document interventions PCEA plan flexibility during implementation. This tool becomes continuous monitoring and sustained academic support to schools.



PROFESSIONAL DEVELOPMENT

PRDE's Professional Development Institute promotes the professional development of all educators with the goal of strengthen their intellectual and professional capabilities and creativity. The Institute provide capacity building on innovative teaching strategies and offers support of individual educator's professional development plans.

Puerto Rico's Professional Standards for Teachers and the *PRDE Profile of the School Director* establish the competencies for effective teaching and leadership that promote student learning and enhance professional practice; while defining what high quality teaching and leading should look like in all PRDE's schools. These standards are based on the National Board for Professional Teachers Standards and the Interstate New Teacher Assessment and Support Consortium. All professional development activities PRDE provides to teachers and school director are consistent with these standards.

The following services are provided to teachers

<p>1. Pre-Service</p>	<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
<p>2. In-Service (newly hired - 0-3 years)</p>	<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
<p>3. In-Service (4 years in service and beyond)</p>	<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

For school directors, professional development focuses on academic, administrative, and fiscal areas that help them 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. In addition, 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), and
- 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.

In 2014, PRDE implemented an online needs assessment with teachers. Using this data, PRDE will generate reports and identify professional development needs. During the current school year PRDE established the administrative guidelines and protocol to govern the development and selection of professional development. PRDE believes this uniform process will improve the quality of the professional development it provides its teachers and school directors.

PROFESSIONAL DEVELOPMENT IN SUPPORT OF EDUCATOR EVALUATION

PRDE's new comprehensive teacher and school director evaluation system is linked to a professional development system that will provide support (i.e., training, coaching, guidance, resource materials, etc.) to teachers and school directors in specific areas in need of improvement. PRDE provides supports job-embedded coaching or other forms of assistance to support the transfer of new knowledge and skills to the classroom.

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.

Advisory Committee on Teacher and School Director Evaluation Systems

PRDE established an Educator Evaluation and Professional Development workgroup within the Secretary's Advisory Committee focused on professional development to support the educator evaluation process. The goals of this workgroup is to

- Ensure PRDE develops public policy based in the best practices
- Develop appropriate regulation
- Ensure PRDE provides rigorous support systems that align with the needs of its teachers and school directors
- Provide input and recommendations to the Secretary and Office of Academic Affairs
- Provide recommendations for teachers and school directors evaluation and support system

Membership in this workgroup include distinguished and experienced members of the Island's Education and Private sectors. The members 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. This committee was formed 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.

In the last year, the Advisory Committee collected and summarized feedback during its meetings with stakeholders. They also made recommendations for PRDE's professional development offerings related to educator evaluation based on feedback from educators who participated in the pilot implementation

of PRDE's evaluation system. The Advisory Committee also provided input into PRDES' existing professional development offerings, including those discussed in PRDE's response to Principle 1 and Principle 2.

Future Efforts:

- Focus groups and other strategies will carry on to validate new professional development public policy.
- During School year 2015-2016, PRDE will create awareness conduct orientations and discuss the new public policy regarding the professional development with schools, Districts, regions, Central Level, external providers and universities.
- PRDE's Central Level will develop a mechanism to ensure that all school level professional development is aligned with student and teachers needs

Professional Development Plans

Professional development activities will be designed based on the results of the evaluations instruments of each teacher and school director as required by evaluation system regulations. Following is a table of alignment of the Teachers Professional Standards with the evaluation cycle rubric:

Standard	Alignment with evaluation cycle rubric
Standard 1: Knowledge of the academic subject	In the teaching session specifically established the focus in the planning, enhancing the quality and quantity of the technical assistance and coaching directly related to the subject.
Standard 2: Teaching knowledge	Professional Development log is develop taking into account the formative visits results and the needs identified to pursuit the specific help regarding teaching knowledge that the teacher's needs.
Standard 3: Instructional Strategies	The evaluation cycle measures the models, strategies and framework used by the teacher in the instruction process.
Standard 4: Learning environment	The organization of the classroom and the planning of an adequate atmosphere are part of the evaluation rubric as a specific criteria.
Standard 5: Diversity and special needs	The differentiation of the teaching process, the inclusion optic and the proper considerations regarding special needs and gaps of the students is present in all the evidence required for the compliance of the teaching and learning process.
Standard 6: Evaluation and Assessment	Evaluation and assessment are a specific criteria into the evaluation rubric taking into account the specific needs, LSP students and the students and parents' right to know about evaluations criteria and content.

Standard 7: Integration of Technology	The use of the information sources, the available technology in the school and the enrichment of the educational process using innovative technologies are part of the requested evidence in the rubric.
Standard 8: Communication and Language	As part of the teaching and learning process assessment the teachers must evidence the use of effective communication through the use of assertive questions that stimulate critical thinking and the developing of activities that enhance of speaking and written skills.
Standard 9: Family and Community	The rubric requires that the teacher must evidence the effective communication with parents and peers, the update of information regards student progress is a requirement for the compliance.
Standard 10: Information gathering	Teachers must evidence according to the rubric the continues update of the information regarding students' progress through reports every 10 weeks, also teachers must demonstrate domain in the analysis of the data of the students' performance and the use in the lesson planning.
Standard 11: Professional Development	Professional development is a specific criteria into the evaluation cycle of teachers. Professional development plans are based on the performance showed by the educators and they must comply with the submission of evidence of attendance to professional development activities align to performance and students' needs.

Professional Growth Plans

Research indicates that poor teacher and 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. Given the rigor of these standards, PRDE trusts its professional development can remediate poor teacher and school director performance. Through its comprehensive educator evaluation system, PRDE has also made additional supports available to teachers and school directors and considers 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 elaborate cooperatively and reflect the ideas and insights of school directors and teachers. 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.

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.

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.

Ensuring Implementation

PRDE's implementation of its evaluation and professional development supports is led by the Central Level, similar to how a LEAs implementation these systems in other States. The Office of Academic Affairs directs each District to implement the PRDE evaluation system. Districts staff ensure that school directors implement evaluations. All of this activity is recorded in SAMA, which is described in Principle 4. Implementation and barriers that are affecting schools' efforts to use these new systems will also be documented and reported through SAMA.

PRDE recently reorganized its internal structure to support improvement implementation of its Flexibility Plan. All key staff responsible for implementing PRDE's educator evaluation and professional development systems will meet weekly to ensure full execution of required activities. Managers in each area will report significant system-wide barriers to implementation. The Undersecretary for Academic Affairs will discuss these barriers 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, responding to ineffective rating categories, delays in the development of other assessments, and/or need to refine growth scores. Recommendations for action plans to remove barriers through

administrative or management changes will be developed at the beginning of each new school year. PRDE will also seek out experts in these areas to help facilitate full and timely implementation.

PRDE's Office of Academic Affairs and Office of Federal Affairs will hold monthly meetings with Regional and District staff to review and assess the degree of implementation at the school level.

Review and Improve

PRDE believes that a comprehensive educator evaluation system should continuously evolve and should reflect the larger evolution of PRDE 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 each year to ensure its components are still in alignment with nationally recognized models for evaluation and federal guidelines.

Annually, PRDE will evaluate the effectiveness and appropriateness of the measures used to report student achievement as an indicator in its evaluations system. In addition, PRDE will analyze the results of its evaluation system and gather feedback from stakeholders to determine the need to revise its evaluation instruments. Revised evaluation instruments would be presented to focus groups meetings to allow for stakeholder review, comment and buy-in.

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.

PRDE envisions that revisions to current evaluation instruments could 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.

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 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.

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 established the Burden Reduction Taskforce (BRT) to make recommendations on how to reduce duplication and unnecessary burdens at the District and school levels. The Burden Reduction Taskforce includes 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 meets at least three times during the academic school year and once during the summer and solicits input from stakeholders including Superintendents, content area facilitators, other PRDE administrative staff, school directors, and teachers.

The BRT develops recommendations to be offered to the Governor and Secretary of Education related to reducing duplication and unnecessary burden on Districts and schools by building on current initiatives, streamlining procedures, building District capacity, and reducing duplicative efforts.

Accomplishments

The BRT evaluated statewide systems and established a mandate-relief program to streamline procedures at Districts and schools. The BRT examined federal and state accountability systems and aligned requirements where possible. ***One example of this is revision of the contracts process***

- **SEPI:** The Contract Unit of the Auxiliary Secretary of Human Resources developed and implemented an electronic system, known as SEPI, as a tool to manage the contracting of personal services across all units of the Department in a more efficient manner. In parallel, the Contract Unit also developed and implemented an online system, known as RECLUTA, to manage the application process for available positions from these personal service contracts. These systems not only streamline and standardize a previously manual process, but also have embedded controls to ensure personal service contracts comply with established policies and applicable regulatory requirements.

The implementation of SEPI and RECLUTA allows the Department of Education to effectively process personal service contracts for part-time and irregular employees on a timely manner. On average, the Contract Unit processes approximately eight thousand personal service contracts on a yearly basis, satisfying the resources needed by the various unit of the Department to improve services provided to the student population. Among the key benefits and functionalities of the systems implemented are:

- A more uniform and simplified contracting process that reduces the burden of manual documentation;
- Streamline communication among the schools, Districts, regions and central office for required contract approvals and authorizations;
- Improved timeliness of contracting process, with the ability to process higher volume of contracts more effectively;

- Access to a greater pool of qualified individuals to fill available part-time and irregular positions;
- Greater budget control and visibility over payroll expenses;
- Improved timeliness and accuracy of payments for personal services rendered; and
- Availability of audit trail and formal documentation for all personal service contract transactions.

The BRT examined statewide processes related to student accounting system, personnel system, student assessment/report card system, achievements of the PCEA report online, development of dashboard and online professional development registration system.

The BRT reviewed the cycles of all compliance monitoring cycles to determine if they can be lengthened to afford Districts some reprieve from the burden of preparation. ***One example of this is revision of the PRDE's monitoring process***

- PRDE designed a consolidated monitoring risk assessment to determine high- risk schools and districts and will implement its monitoring process in prioritized schools over a three-year monitoring cycle. PRDE's monitoring process is intended to facilitate the development of a culture of communication within schools, among schools, across districts and regions and throughout PRDE's system of public education. To effectively monitor the schools, PRDE created monitoring instruments and trained, staff and established monitoring calendars. These new monitoring instruments address both programmatic and fiscal/compliance elements. After a school or district has submitted all of the required monitoring documents and the necessary onsite visits have been completed, PRDE staff will determine if the school and/or district has demonstrated compliance status. Following monitoring, schools and/or districts will receive a formal compliance letter and a monitoring results report. Monitoring findings are shared with Technical Assistance staff at the district level so appropriate follow up can be provided. All this activity is recorded in an online platform. Central Level and District staff can access the online platform to track and oversee the monitoring and technical assistance processes.

Current Efforts

The BRT continues to examine 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. The BRT is also working to identify any unnecessary statutes and/or regulations related to school facilities or services that could be removed.

The BRT continues to work to make recommendations on how to maintain deadlines on a central master platform to manage district and school level operations. To this end, PRDE created SAMA. SAMA is an electronic system that permits Central Level staff to

- Examine the documented interactions between schools and District resources
- Track the progress and interventions defined in schools PCEA.
- Make informed decisions related to allocation of staff time based on an assessment of schools' progress implementing interventions
- Document District level needs for specific training or resources and bring teachers and staff together across Districts and regions in a way that maximizes resources
- Consolidate district and school level reporting requirements where possible and eliminate any duplicative or unnecessary requirements on Districts.

Future Efforts

- The BRT will continue to 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 hopes to consolidate all District submissions of plans, reports, or other related applications.
- The BRT will continue to 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 continue to gather 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.