
ESEA Flexibility

Request for Window 3

Puerto Rico Department of Education

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INTRODUCTION

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

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

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

Review and Evaluation of Requests

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

GENERAL INSTRUCTIONS

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

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

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

A high-quality request will (1) if an SEA has already met a principle, provide a description of how it has done so, including evidence as required; and (2) if an SEA has not yet met a principle, describe how it will meet the principle on the required timelines, including any progress to date. For

example, an SEA that has not adopted minimum guidelines for local teacher and principal evaluation and support systems consistent with Principle 3 by the time it submits its request for the flexibility will need to provide a plan demonstrating that it will do so by the end of the 2012–2013 school year. In each such case, an SEA’s plan must include, at a minimum, the following elements for each principle that the SEA has not yet met:

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

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

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

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

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

Each request must include:

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

Requests should not include personally identifiable information.

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

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

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

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

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

Request Submission Deadline

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

Technical Assistance for SEAs

The Department has conducted a number of webinars to assist SEAs in preparing their requests and to respond to questions. Please visit the Department's Web site at:

<http://www.ed.gov/esea/flexibility> for copies of previously conducted webinars and information on upcoming webinars.

For Further Information

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

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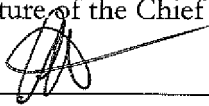
For each attachment included in the *ESEA Flexibility Request for Window 3*, label the attachment with the corresponding number from the list of attachments below and indicate the page number where the attachment is located. If an attachment is not applicable to the SEA’s request, indicate “N/A” instead of a page number. Reference relevant attachments in the narrative portions of the request.

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COVER SHEET FOR ESEA FLEXIBILITY REQUEST

Legal Name of Requester: Edward Moreno Alonso, Ed. D.	Requester's Mailing Address: P. O. Box 190759 San Juan, P.R. 00919-0759
State Contact for the ESEA Flexibility Request Name: Grisel Muñoz Marrero, Ph.D. Position and Office: Undersecretary of Academic Affairs Contact's Mailing Address: P. O. Box 190759 San Juan, P.R. 00919-0759 Telephone: 787-773-3060 Fax: Click here to enter text. Email address: munozmg@de.pr.gov	
Chief State School Officer (Printed Name): Edward Moreno Alonso, Ed. D.	Telephone: 787-773-5803
Signature of the Chief State School Officer: X 	Date: August 31, 2012
The State, through its authorized representative, agrees to meet all principles of the ESEA Flexibility.	

WAIVERS

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

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

section only to LEAs with schools identified for improvement, corrective action, or restructuring. The SEA requests this waiver so that it may allocate section 1003(a) funds to its LEAs in order to serve any of the State’s priority and focus schools that meet the definitions of “priority schools” and “focus schools,” respectively, set forth in the document titled *ESEA Flexibility*.

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

Optional Flexibilities:

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

- 11. The requirements in ESEA sections 4201(b)(1)(A) and 4204(b)(2)(A) that restrict the activities provided by a community learning center under the Twenty-First Century Community Learning Centers (21st CCLC) program to activities provided only during non-school hours or periods when school is not in session (*i.e.*, before and after school or during summer recess). The SEA requests this waiver so that 21st CCLC funds may be used to support expanded learning time during the school day in addition to activities during non-school hours or periods when school is not in session.
- 12. The requirements in ESEA sections 1116(a)(1)(A)-(B) and 1116(c)(1)(A) that require LEAs and SEAs to make determinations of adequate yearly progress (AYP) for schools and LEAs, respectively. The SEA requests this waiver because continuing to determine whether an LEA and its schools make AYP is inconsistent with the SEA’s State-developed differentiated recognition, accountability, and support system included in its ESEA flexibility request. The SEA and its LEAs must report on their report cards performance against the AMOs for all

subgroups identified in ESEA section 1111(b)(2)(C)(v), and use performance against the AMOs to support continuous improvement in Title I schools.

13. The requirements in ESEA section 1113(a)(3)-(4) and (c)(1) that require an LEA to serve eligible schools under Title I in rank order of poverty and to allocate Title I, Part A funds based on that rank ordering. The SEA requests this waiver in order to permit its LEAs to serve a Title I-eligible high school with a graduation rate below 60 percent that the SEA has identified as a priority school even if that school does not otherwise rank sufficiently high to be served under ESEA section 1113.

ASSURANCES

By submitting this request, the SEA assures that:

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

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

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

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

5. It will report annually to the public on college-going and college credit-accumulation rates for all students and subgroups of students in each LEA and each public high school in the State. (Principle 1)
6. If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and uses achievement on those assessments to identify priority and focus schools, it has technical documentation, which can be made available to the Department upon request, demonstrating that the assessments are administered statewide; include all students, including by providing appropriate accommodations for English Learners and students with disabilities, as well as alternate assessments based on grade-level academic achievement standards or alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities, consistent with 34 C.F.R. § 200.6(a)(2); and are valid and reliable for use in the SEA's differentiated recognition, accountability, and support system. (Principle 2)
7. It will report to the public its lists of reward schools, priority schools, and focus schools at the time the SEA is approved to implement the flexibility, and annually thereafter, it will publicly recognize its reward schools as well as make public its lists of priority and focus schools if it chooses to update those lists. (Principle 2)
8. Prior to submitting this request, it provided student growth data on their current students and the students they taught in the previous year to, at a minimum, all teachers of reading/language arts and mathematics in grades in which the State administers assessments in those subjects in a manner that is timely and informs instructional programs, or it will do so no later than the deadline required under the State Fiscal Stabilization Fund. (Principle 3)
- NOTE:** Currently, student growth data does not exist. However, the PRDE is currently working with a nationally recognized vendor to develop a growth model that encompasses our state testing program as well as a series of assessments in the non-tested grades and subjects for the purpose of providing student growth data to every teacher to inform instructional practices and teacher evaluations. It is expected that growth data will be made available for the 2012-2013 reporting period.
9. It will evaluate and, based on that evaluation, revise its own administrative requirements to reduce duplication and unnecessary burden on LEAs and schools. (Principle 4)
10. It has consulted with its Committee of Practitioners regarding the information set forth in its request.
11. Prior to submitting this request, it provided all LEAs with notice and a reasonable opportunity to comment on the request and has attached a copy of that notice (Attachment 1) as well as copies of any comments it received from LEAs (Attachment 2).
12. Prior to submitting this request, it provided notice and information regarding the request to the public in the manner in which the State customarily provides such notice and information to the public (*e.g.*, by publishing a notice in the newspaper; by posting information on its website)

and has attached a copy of, or link to, that notice (Attachment 3).

- 13. It will provide to the Department, in a timely manner, all required reports, data, and evidence regarding its progress in implementing the plans contained throughout this request.
- 14. It will report annually on its State report card, and will ensure that its LEAs annually report on their local report cards, for the “all students” group and for each subgroup described in ESEA section 1111(b)(2)(C)(v)(II): information on student achievement at each proficiency level; data comparing actual achievement levels to the State’s annual measurable objectives; the percentage of students not tested; performance on the other academic indicator for elementary and middle schools; and graduation rates for high schools. It will also annually report, and will ensure that its LEAs annually report, all other information and data required by ESEA section 1111(h)(1)(C) and 1111(h)(2)(B), respectively.

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

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

CONSULTATION

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

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

Our teachers in Puerto Rico are not currently represented by elected and certified teachers’ unions, however, teachers are active in four primary teacher representative organizations, including non-certified teacher unions (for more context please see pages 23-24). As a result, we were deliberate in inviting a significant number of teachers to each of our four public forums. Teachers and other school personnel participated in these forums in a noteworthy way. In addition to the overall descriptions of stakeholder feedback provided below (pages 13-14), we received a tremendous amount of positive feedback from our teachers. In particular, teachers were excited about the opportunities that a new differentiated accountability system can bring, and were supportive of the overarching goals and structure of this differentiated system. Most importantly, the teachers believe that this new accountability system will work better for Puerto Rico’s students, including students with disabilities.

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

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

The following chart outlines the primary meetings conducted with diverse stakeholders to engage them in the consultation process and to inform development of this ESEA flexibility request. In preparation for each of these meetings, an official memo was sent to invite stakeholders and representatives to participate in these important conversations. Each conversation included a presentation of the ESEA flexibility request, followed by discussions of the proposals components and the potential impact of flexibility on schools, teachers, students, and the island overall. During the four forums identified in the chart below, comment cards were made available to attendees to submit written feedback if desired. In addition, the letter from the Secretary (described above) was provided to each forum participant.

Primary Stakeholder Meetings Conducted

Date	Forum	Stakeholders	PRDE Central Staff
November and December 2011	UPR Leaders Meetings (4) <ul style="list-style-type: none"> Four meetings at the University of Puerto Rico, Rio Piedras campus 	UPR President, 15-20 professors in the areas of mathematics, science, Spanish, and English from the UPR, faculty from private universities	Dr. Grisel Muñoz, Undersecretary of Academic Affairs
July 2012	Coordinators Forum (1)	Regional coordinators for PPAA/PPEA	Pura Cotto Lopez, Special Assistant/Assessment Director
August 2012	Regional Forums (2) <ul style="list-style-type: none"> Forum for eastern regions Forum for western regions 	Teachers, school directors, content facilitators, special education personnel, superintendents, social workers, regional coordinators for PPAA/PPEA, parents, and community members	Pura Cotto Lopez, Special Assistant/Assessment Director
August 2012	Title I Committee of Practitioners (1)	COP members including central level personnel, parents, school directors, private school representatives and university members	Pura Cotto Lopez, Special Assistant/Assessment Director
August 2012	Community Leaders Forum (1)	NCLR and LULAC Puerto Rico Chapter members, Fundación Flamboyán, Fundación Angel Ramos, Fundación Banco Popular, SAPIENTIS, Instituto de Política Educativa y Desarrollo Comunitario (IPEDCO), and university representatives	Pura Cotto Lopez, Special Assistant/Assessment Director

University Meetings

In November and December of 2011, the Undersecretary of Academic Affairs participated in four meetings with the University of Puerto Rico and other university faculty to discuss the need for ESEA flexibility and its implications for the island. These meetings focused on college and career readiness and the need to lay additional groundwork to support Puerto Rico's submission of an ESEA flexibility request. Together, the Undersecretary, the UPR president, and UPR faculty discussed the process to align state high school standards with college expectations (i.e. freshman syllabus) in response to Principle 1. After these meetings, a group of 15-20 UPR professors conducted a 5-week alignment analysis with an emphasis on math, science, Spanish, and English. This process culminated in the presentation of these analyses to the PRDE Undersecretary of Academic Affairs, along with supporting documents, as well as a letter from the UPR president confirming the rigor of Puerto Rico's standards and alignment with college expectations.

Forums

In addition, from July 2012 through August 2012, we held four stakeholders meetings with approximately 130 participants including teachers, school directors, content facilitators, special education personnel, superintendents, social workers, regional coordinators for PPAA/PPEA, parents, civil rights organizations, and various members of the community including community leaders. In each of these meetings we had approximately 20 to 40 participants. The purpose of these meetings was to provide stakeholders with an overview of the flexibility request and to solicit feedback on the primary components of the flexibility request. An official memorandum (attachment 12) was sent to invite stakeholders and representatives from all seven regions to these meetings. Stakeholders had the opportunity to share their opinions, comments, and concerns about this request. A summary of the feedback received from our stakeholders is provided below, organized by principle.

Committee of Practitioners Meeting

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

Stakeholder Feedback

Regarding college and career readiness, the stakeholders agreed that our standards are college and career ready providing students with a smooth transition from high school to post secondary studies. In addition stakeholders believe that PRDE content standards and grade-level expectations provide students with better opportunities internationally and prepare students to be responsible citizens. Also, stakeholders pointed out that there is a rigorous alignment between the standards and the curriculum. On the other hand, stakeholders also expressed their interest in PRDE promoting partnership with business, universities and schools. At the same time, stakeholders indicated that we should reevaluate

technical and vocational courses, providing more technical and vocational courses in the public schools and providing more flexibility for special education students to enter in our vocational schools. Moreover, stakeholders indicated the importance for all non-tested grade and subject areas curriculum to better align with their standards and increasing PRDE's communication with all post secondary institutions and universities to integrate university programs within the public schools. Finally, stakeholders indicated the need to reevaluate *programas de educacion acelerada* and their curriculum as well as placements exams.

Stakeholders agreed that the existing accountability system is punitive. Although there were some concerns about the changes in the new accountability system, stakeholders thought that the new proposed system allows for better classification of schools as well as better use of data for decision making. Participants from these meeting provided input on additional incentives for rewards schools (both highest performing and high progress). Some of these incentives are: allow reward schools to paint in a different color, provide internet in school, allow high school students from reward schools to take entry level college courses (not advanced placement), incentives for teachers and school directors, public recognition through the media, and recognition from the Governor and Secretary of Education. Stakeholders also proposed that reward schools should have their own flag, mascot, have science and technology laboratories and obtain a maintenance contract for one year on technical equipment.

Stakeholders indicated that PRDE needs to redesign their current system for a clear merit system. In addition, participants thought that teachers and schools director are very effective but they need more support and coaching. Stakeholders strongly agreed a fair and effective evaluation system should be tied to student achievement, and the importance of having formative and summative evaluations in all grades and subjects. Finally, participants indicated that it is important with the new evaluation system for school directors to restructure the school schedule to offer better options to students and for classroom visits.

EVALUATION

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

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

OVERVIEW OF SEA’S REQUEST FOR THE ESEA FLEXIBILITY

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

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

Overview

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

Principle 1 reflects the PRDE’s rigorous, approved, and adopted college and career ready academic content standards in Spanish language arts and mathematics for grades K-12. These standards include grade-specific content expectations for all students in each grade level. A gap analysis study conducted in September 2011 showed a high correspondence between the PRDE academic content standards and the Common Core State Standards. In addition, the University of Puerto Rico has conducted an analysis that determined that the PRDE standards are sufficient to ensure student success in college and career. Principle 2 proposes a differentiated accountability system that sets new ambitious AMOs; identifies priority, focus, and reward schools; identifies differentiated supports for schools in all categories including the 75% of schools in the middle; and engages the community and other stakeholders to participate in educating Puerto Rico’s school children. Principle 3 demonstrates the PRDE’s commitment to an evaluation process that recognizes and enhances teacher and school director strengths while identifying and supporting their areas of need. Finally, Principle 4 exhibits our determination to reduce the administrative burdens inflicted on our districts and schools.

We believe all of the work outlined in this flexibility request will move us toward greater success in closing achievement and graduation gaps. For far too long, significant portions of our student population have struggled to achieve at desired levels. Implementation of PRDE’s academic content standards is the vehicle to reenergize our focus on classroom instruction and this flexibility is a timely opportunity to focus on long-term, continuous improvement. Combined with the systemic improvements we have made over the last several years, we believe that it is realistic and appropriate to hold our schools accountable for student growth. We believe that our schools can both grow

achievement levels for individual students and close gaps between groups of students.

The implementation of the plans described in this ESEA flexibility request will enhance the ability of the Puerto Rico Department of Education and the schools across the island to increase the quality of instruction for all students and improve their achievement levels. Puerto Rico’s dedication to accountability, support for educators, spirit of collaboration, and excellence for all students will be essential in guiding Puerto Rico in preparing world-class college and career ready students.

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

Background and Context for Puerto Rico’s Flexibility Request

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

Puerto Rico’s Vision and Mission

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

Puerto Rico’s Educational System

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

Each school in Puerto Rico is required to develop or modify annually either an action plan for continuous improvement or a school improvement plan. School Improvement Grant schools use the school improvement plan (based on the results of a SIG needs assessment) while all others develop action plans (based on the Florida and Islands Comprehensive Center, FLICC needs assessment). We have developed integrated technology tools that guide the development of the action plans and collect the data for easy monitoring by PRDE.

The PRDE oversees one island-wide education system comprising 1,457 public schools serving more than 471,000 students from kindergarten through grade 12 and employing 31,136 teachers (see Exhibit 1 for the number of schools per level). Of these teachers, 78% have a bachelor's degree, 21% have obtained a master's degree and less than 1% has a doctoral degree. Only about 0.60% of the teachers have less than a bachelor's degree. Most schools in the system (99%) are Title I schools; only 18 public schools are state funded. About half of all the public schools (51%) are considered rural.

Exhibit 1. Number of Schools per Level and Grades Served

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

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

For administrative purposes, the PRDE divides the geographic area of Puerto Rico into seven regions and 28 school districts. A region is a functional unit of the PRDE under the supervision of a director in which PRDE develops administrative facilitation work for the benefit of school districts and schools falling within a geographical area. Regional directors report directly to the undersecretary of administrative affairs at the central level and are responsible for a variety of activities such as organizing training programs for school administrative personnel (e.g., budget, school staff management, fiscal audits, and purchasing procedures); coordinating transportation services; organizing academic, recreational, and cultural activities for schools; and managing professional services for students with disabilities. Regions are also responsible for providing support to address administrative issues in different schools and providing recommendations for addressing such

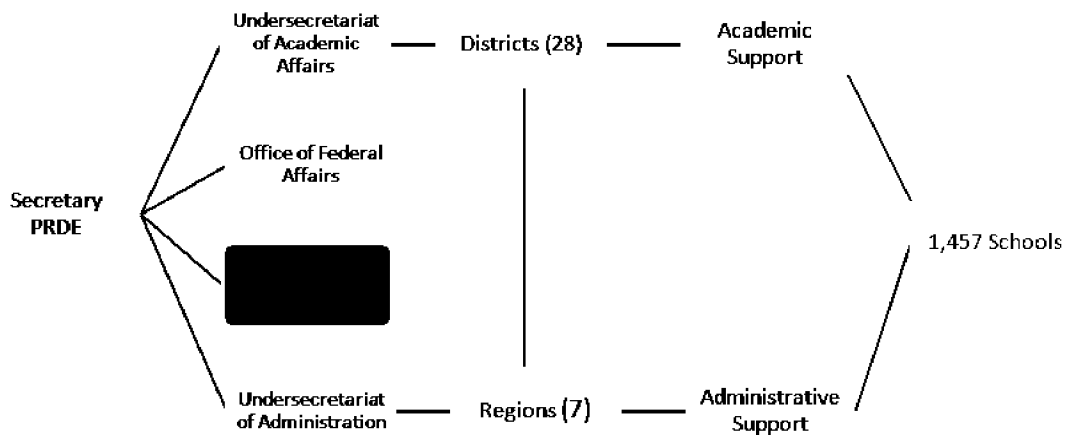
problems. In addition, regions support schools on discipline norms; maintain teacher certification records; provide orientation to school directors on services and systems related to school security as well as any other administrative function delegated by the secretary of education.

Although PRDE uses the term “districts,” these entities are not independent local educational agencies (LEAs). This branch of the PRDE operates under the direction of a district superintendent and oversees all academic activities to the schools within each district’s geographical area. District superintendents report directly to the undersecretary of academic affairs at the central level. Also at the district level are auxiliary superintendents whose responsibilities include direct technical assistance to school directors, and facilitating and overseeing compliance of federal regulations and procedures. Districts also have academic auxiliary superintendents who oversee all academic activities within the schools. Under the academic auxiliary superintendents are academic facilitators who serve as instructional leaders, coaches for teachers, and facilitate professional development on curriculum and instructional strategies. These facilitators also provide support in the design of programs adjusted to the needs of students in the school, and collaborate with school directors in developing programs for talented students, low-achieving students, students at-risk of dropping out, and special education and LSP students.

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

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

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

Exhibit 2. Relationships Between PRDE Levels

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

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

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

Since Law No. 149 does not address internal policies, secretaries of education usually issue policies known as *Cartas Circulares* (Circular Letters) to address those needs. A circular letter is a publication or communication to provide guidelines on how to comply with a regulation or statute and is authorized by the secretary of education. In essence, these are the vehicle to transmit communications between the secretary and personnel at the central, regional, district, and school level and these guide the fiscal, academic, and administrative procedures of the Department of Education. For example, *Carta Circular 17-2010-2011* establishes the guidelines for an academic school calendar that must include at least 180 instructional days and six daily hours of instruction. In

addition, Regulation rules (*Reglamentos*) are meant to carry out the organic law and its amendments. The regulations are authorized by the secretary of education and the secretary of state.

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

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

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

Limited Spanish proficiency (LSP) is the student group in Puerto Rico that under the USED approved Accountability Workbook (2009) replaces the Limited English Proficient (LEP) subgroup. There are currently 3,349 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.

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

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

Challenges

Puerto Rico has several unique challenges that are explained below and help to demonstrate PRDE's need for ESEA flexibility. Key among these challenges is: 1) a significant number of schools in improvement, and 2) the need for implementation of a longitudinal data system.

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

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

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

Although PRDE collects significant information on students and schools, including demographic information and performance data, obstacles to analyzing and using this data currently exist. For example, the information on students with disabilities is located in two different systems, the SEAS Web (information system for special education students) and the island-wide student information system (*Sistema de información estudiantil*, SIE). This poses a challenge when tracking these students in the system since students have a different ID number in each system. Our department recently received a Statewide Longitudinal Data Systems (SLDS) grant from the U.S. Department of Education. As we implement this work, the integration between these systems will improve.

Puerto Rico’s Statewide Longitudinal Data Systems Grant

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

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

We are working towards creating a culture of decision making based on data through workshops with teachers and administrators and presenting information at conferences and in literature for distribution. In June 2012, we conducted a data use workshop for regional coordinators, school directors, and superintendents from all seven regions of the island. The purpose of this workshop was to advance our efforts toward effective communication and improve the use of PPAA results data. The workshop was designed to support the following goals: 1) improve participants’ understanding of assessments results and interpretations; 2) improve participants’ knowledge and ability to purposefully utilize data in school-wide decision making; and 3) strengthen participants’ ability to access and use accurate data to inform decisions. It is our intention to assist districts and schools with technology that results in increased use and analysis of data that will inform instruction. Our Statewide Longitudinal Data Systems (SLDS) Grant will contribute to attaining this goal.

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

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

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

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

Response to Challenges

Puerto Rico has a modern, complex educational system with rigorous academic and content standards, and aligned curriculum, that are well suited to ensure that students who master the standards are college and career ready as evidenced by the analysis completed by the UPR. We are successfully making progress to enhance our schools and are implementing several grants and other island initiatives to ensure continued progress. Like any state, we have our formal and informal structures that shape our systems and modes of operations. As a unified system, several of the sections in this request are answered differently than they would be in a state with both an SEA and LEAs. We value the education of our children and work to ensure that all children have access to quality learning opportunities and are prepared for their futures. Our students’ futures require proficient use of Spanish and math, as well as the acquisition of the English language and mastery in the other subjects that we teach and that serve to enrich the lives of our students. This request, if approved, will allow the PRDE to make quantum level changes to make our system more effective for all students, especially SWDs and LSP students.

Theory of Action Guiding PRDE’ Flexibility Request

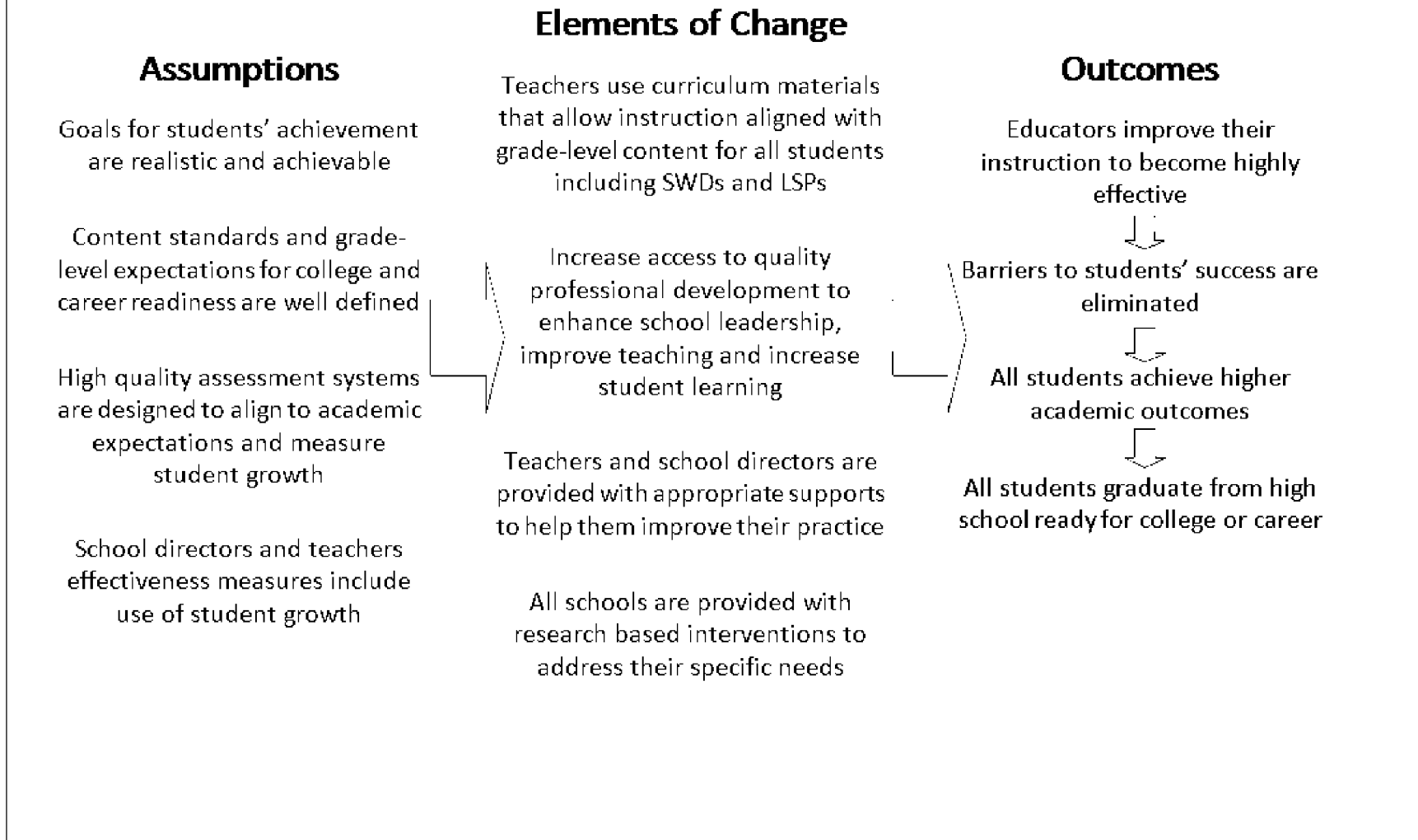
The theory of action in Exhibit 4 provides a broad representation of the logic guiding this flexibility request. The first box contains the assumptions about each part of our education system addressed in principles 1 through 3. The last statement in the outcomes box is the ultimate goal of the PRDE’s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

We recognize the impact of different variables such as effective educators and school leaders, instructional materials, and supports and interventions have on student achievement. We are

committed to ensuring that every student in our public schools achieves mastery in core content areas and graduates from high school with the knowledge and skills necessary to succeed in college or career. Thus, in order to achieve the outcomes illustrated in the theory of action, we need to achieve the outcomes listed for the PRDE educational system. During the last five years we have made efforts to improve our standards, assessment, and accountability system; these efforts serve as the foundation for the proposed plans in this ESEA flexibility request related to the elements of change.

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

Exhibit 4. Theory of Action



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

1.A ADOPT COLLEGE- AND CAREER-READY STANDARDS

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

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

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

2007 Content Standards and Grade Level Expectations

The Puerto Rico Department of Education (PRDE) has taken several steps over the preceding four years to make improvements in our systems of standards, assessment, and accountability. We made

the first step in our leap forward when we revised our academic content standards in 2007 to support more rigorous academic instruction and alignment with national expectations. We formally approved and adopted new academic content standards in Spanish language arts and mathematics for grades K-12 in 2007. These standards include grade-specific content expectations for all students in each grade level. We included teachers from each of the content areas across all regions, curriculum specialists, special education teachers, professors from a variety of public and private universities, stakeholders from community agencies, and community members familiar with the instructional needs of students with disabilities and limited Spanish proficiency speakers, in all different stages of the development and revision of the 2007 content standards. We also considered feedback from the public by holding public hearings during the development of the new standards and considering public commentary on the issue.

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

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

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

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

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

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

	Grade 3	Grade 4	Grade 5	Grade 6	Grade 7	Grade 8	Grades 11-12
CCSS	3.72	3.89	3.85	3.93	3.58	3.86	3.46
PRDE	3.44	3.39	3.61	3.20	3.52	3.53	3.54

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

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

University of Puerto Rico Alignment Analysis

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

Standards-based Instruction and Professional Development

Although the 2007 content standards are rigorous and have met the USED peer review requirements, teachers have had challenges implementing these standards in their daily instruction. We have supported, and continue to support, teachers to assure the alignment of their daily plans with these rigorous standards. A study of the links between classroom instruction and PRDE content standards conducted during spring 2010 suggested that teachers need more consistent and effective island-wide training on how to translate standards into comprehensive instruction. This study found that not all teachers have a mastery level understanding of their content area and teachers usually attempt to focus their instruction on the standards they find to be the most important, resulting in lack of consistency in instructional emphasis on key concepts across the island. Findings from a consequential validity study during spring 2011 also suggested that a significant proportion of teachers do not feel prepared to implement standards-based instruction and have a superficial understanding of the academic content and skills reflected in the standards and grade-level expectations.

In response to these findings, and in our continuous efforts to deliver high quality instruction to the students in our public education system, during the 2010-2011 and 2011-2012 school years, we developed curriculum documents in grades K-12 for Spanish language arts, mathematics, science, English as a second language (ESL), and core content courses at the high school level using the Understanding by Design (UbD) approach. To ensure that all students in Puerto Rico have access to high quality curriculum materials we have developed and started implementing our curriculum in different phases including instructional coaching for teachers in six pilot schools and professional development sessions for teachers and content area facilitators.

Phase One: 2010-2011

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

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

Also, a pilot professional development boot camp was established for selected teachers in grades 4-8 representing each of the seven regions in Puerto Rico. The boot camp aimed to address standards-based curriculum and instructional support in two main areas: 1) overview and interpretation of content area standards; and 2) overview of curriculum maps and introduction of standards-based instruction, including best practices for content area instruction. A boot camp work session took place over four days in June 2011 to present draft curriculum and professional development materials to

about 36 teacher leaders from each of the six pilot schools. A full-scale boot camp took place over two days in October 2011 for approximately 65 content area teachers from the six pilot schools to be presented with the final curriculum maps and supplemental materials with the expectation that teachers would return to their schools and implement the newly acquired curriculum frameworks during the 2011-2012 school year.

Phase Two: 2011-2012

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

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

In our commitment to continue building capacity across the island, a full scale professional development boot camp was held in June 2012 for over 300 academic facilitators representing each one of the seven regions in Puerto Rico. The purpose of this boot camp was to provide the academic facilitators with an overview of the different content areas curriculum maps and introduction of standards-based instruction, including best practices for content area instruction for grades K-3 and 9-12. The academic facilitators were presented with standards-based assessment strategies that are aligned with the curriculum maps and shared ideas with colleagues about how to use the curriculum tools and strategies in the classroom. The academic facilitators will be key to our efforts in the wide-scale implementation of the curricula across the island during the 2012-2013 school year. For example, during the summer of 2012 we asked all school districts to develop a work plan for the implementation of the curriculum materials for all schools including training for school directors, academic teachers, and special education teachers. School directors received a curriculum workshop on July 2012 and teachers received their curriculum workshop on September 2012. The Office of Academic Services also trained the program directors for the four core content areas and other non tested subject areas. The program directors from the core content areas will disseminate the curriculum materials to their teachers while the Office of Academic Services made a commitment to revise the standards for non tested subject areas and develop aligned curriculum materials for these.

One fifth of the student population in Puerto Rico has been identified as students with disabilities. We acknowledge the importance of providing students opportunities to learn academic content and setting high expectations regardless of their disability. Our goal is to maximize these students access to the general curriculum by providing them with a high quality standard based instruction linked to the 2007 content standards and grade-level expectations and ensure that students will graduate from high school ready for college and careers. All students with disabilities must have access to the same curriculum as their peers, age appropriate materials, and an engaging academic experience.

In addition, we instill in the teachers the need to set high expectation for their students with disabilities in order to prepare them for college or work. Our transition program at the school level

provides orientation to teachers and students about services available in the community to help students with disabilities for the transition to postsecondary studies or work. For example, the schools actively recruits partners to work with students to help them transition via apprenticeships, etc.

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

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

In our continuing efforts to provide teachers with resources and supports necessary to deliver high quality standard-based instruction to students with significant cognitive disabilities, during spring 2011 we developed a series of modules to support the PPEA assessment training process and provide teachers with a tool to further incorporate best practices on the alignment of standards, instruction, and assessment. Our main goal with these modules is to increase understanding of effective ways to provide instruction to students with significant cognitive disabilities to promote progress in all academic areas.

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

scheduled to be released in early 2013 and the operational form of the PODER (*Prueba Óptima del Desarrollo del Español Realizado*) test for kindergarten will be released in August 2013. Operational test forms for grades 1-2 will be available in August 2014. Puerto Rico will have the opportunity to participate during the validation process as well as the bias and sensitivity reviews for Kindergarten items in September 2012.

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

As part of our commitment to promote college participation for all students including SWDs and LSP students, PRDE will 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 as outlined in the recent SLDS grant approved by the USED.

In our continuous effort to set high expectations for teachers and their ability to deliver high quality, college and career ready instruction to our students we have developed strong relationship with University teaching programs in Puerto Rico. Currently there are 33 teaching certification programs at different universities across the island and the Office of the Undersecretary of Academic Affairs has been working closely with these programs. Once teachers graduate these programs they go through the certification process. The teacher certification is granted by the Secretary of Education and serves as the official document that provides teachers with a license to teach in the category and level specified for a determined period of time. Recently, the PRDE in conjunction with the Education Commission of Private Universities went through the process of reviewing these certifications. Members from the University of Puerto Rico, the only four-year public institution in Puerto Rico were also invited to participate in the committee.

In addition, teachers in Puerto Rico must pass the island teacher certification test, the PCMAS (*Pruebas para la Certificación de Maestros en Puerto Rico*) in order to teach in our public schools. A new Regulation will be signed soon to allow PRDE to provide technical assistance to the universities to ensure that the teacher candidates are well prepared to be successful in this test. This effort will be led by the Office of the Undersecretary of Academic Affairs at the PRDE.

Initiatives to Increase College Preparedness

The main goal of our fourth year proposal for the College Access Challenge Grant was to strengthen

and build alliances so as to sustain programs and expand emphasize the outreach activities for students who may be at risk of not enrolling in or completing college. The following descriptions reflect a sample of the activities we have been engaging in under this grant:

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

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

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

<p>Option A</p> <p><input type="checkbox"/> The SEA is participating in one of the two State consortia that received a grant under the Race to the Top Assessment competition.</p> <p>i. Attach the State’s Memorandum of Understanding (MOU) under that competition. (Attachment 6)</p>	<p>Option B</p> <p><input checked="" type="checkbox"/> The SEA is not participating in either one of the two State consortia that received a grant under the Race to the Top Assessment competition, and has not yet developed or administered statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs.</p> <p>i. Provide the SEA’s plan</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</p>
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	<p>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>review or attach a timeline of when the SEA will submit the assessments and academic achievement standards to the Department for peer review. (Attachment 7)</p>
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Statewide Assessment System

The PRDE has developed a comprehensive statewide assessment system to meet NCLB requirements as well as to inform other local decisions. As other states have done, we have submitted evidence to the U.S. Department of Education (USED) demonstrating our compliance with the law’s mandates and the validity of our implemented standards and assessment systems for their intended purposes. In November 2011, we submitted the remaining evidence for the peer review process to the USED, demonstrating that the assessment system meets the rigorous USED requirements. The PRDE is in the process of receiving our letter of approval from the USED certifying that we have substantially met the requirements and the compliance of our standards and assessment systems (we have been informed that our approval letter is in the USED clearance process).

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

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

We also developed performance level descriptors (PLDs) designed to describe the skills and abilities that students possess within each of the four performance levels for each tested subject and grade level. In

In addition to aligning with the PRDE academic content standards, the PLDs were crafted to capture measureable outcomes as reflected in the PPAA assessments. We also commissioned an independent study to examine several questions related to the PLDs and current PPAA cut scores. In this study, panels of Puerto Rico teachers reviewed the PLDs for each grade and subject area and provided feedback about the extent to which each PLD:

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

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

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

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

This study also addressed areas of balance of representation (BOR) and range of knowledge (ROK). BOR

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

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

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

The PRDE will remain committed to ensuring the proper implementation of our accommodations policy. As such, our 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.

We believe that all students deserve the opportunity to show what they know and can do regardless of the severity of their disabilities. With that in mind, the PRDE's assessment system includes an alternate assessment based on alternate achievement standards for students with significant disabilities who

cannot participate in the general assessment: the *Prueba Puertorriqueña de Evaluación Alternativa* (PPEA). We have developed specific guidelines for our IEP teams to review and apply when determining students' participation in the alternate assessment including students' needs for explicit instruction, extensive supports, and substantial modification of the curriculum. Participants in the PPEA comprise approximately 1% of the total tested student population.

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

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

Puerto Rico was one of five entities that collaborated with the University of Kentucky in a four-year validity evaluation project funded by a 2007 General Supervision Enhancement Grant from the Office of Special Education Programs at the U.S. Department of Education. Each of the participating entities conducted a series of studies to address key elements in the interpretive argument for its alternate assessment based on alternate academic achievement standards. One of the studies addressed the extent to which the PPEA is aligned to the Puerto Rico academic content standards and grade-level expectations.

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

We are committed to high quality and aligned assessment systems. In response to findings from the crosswalk study between Puerto Rico content standards and Common Core State Standards that suggest a strong alignment between our mathematics content standards and CCSS mathematics, we plan on developing math test items aligned to Common Core State Standards to the extent possible. Mathematics items created for the 2012-2013 item development cycle will be aligned to both the 2007 Puerto Rico standards and when possible the Common Core State Standards. All items will be aligned to

the Puerto Rico content standards and in cases where there is a clear alignment to the CCSS, these items will be coded to both sets of standards, with the CCSS considered as a secondary alignment. A thorough item bank analysis on existing mathematics items will be performed in order to determine the extent previously developed items align to both the Puerto Rico standards and the CCSS.

Puerto Rico will develop a growth model for Spanish language arts and mathematics in grades 3 through 8 and 11 that is consistent with the current PPAA assessment system. Information about growth models used in other states was gathered in August 2012 by a nationally recognized vendor with significant experience and recognized expertise and will be discussed during our September 2012 Technical Advisory Committee meeting. Data from the 2010, 2011, and 2012 administrations of the PPAA will then be used by our vendor to construct and analyze the characteristics of selected growth model options. The most appropriate growth model will then be selected based on the results of these studies and consideration of other factors important to the PRDE. It is anticipated that student growth information for Spanish language arts and mathematics in grades 3 through 8 and 11 will be available for the 2012-2013 reporting period. A general timeline for the development of the growth model is shown below.

August 2012	Gather information about growth models
September 2012	Discuss growth model options with the Technical Advisory Committee
October – December 2012	Use data from 2010, 2011, and 2012 administrations to develop the growth model
January – February 2013	Incorporate growth scores into the scoring and reporting systems
June 2013	Report growth results for Spanish and Mathematics

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 growth model will be designed to include these assessments to ensure all students are included in the growth model in a consistent manner.

The plan to administer the modified PPAA and PPEA coincides with the plan to modify the current assessments as described above. As items that are more closely aligned with the college and career readiness standards are developed and field tested each year they will be incorporated into the tests to be used in the following year. By continuing this course of development through the 2012-2013 and 2013-2014 school years, we expect to have high-quality assessments that measure student growth in place by the 2014-2015 school year.

In addition to developing and implementing a growth model that encompasses our state testing program, the PRDE will also develop a series of assessment in the non-tested grades and subjects (with the assistance of a national recognized vendor). In all content areas where it is appropriate, standardized assessments will be developed that can be used as a basis for student growth measures. By developing a regression model that uses individual student prior academic achievement to control for differences in students, this growth model can also be used to identify high progress reward schools, provide feedback to schools on their areas of strength, and evaluate teacher and school director effectiveness under a differentiated accountability system.

- **Identifying high progress reward schools:** Five percent (5%) of the total number of schools in Puerto Rico will be identified annually as high progress reward schools. High progress reward schools are those that have the highest percentage of students meeting or exceeding their individual growth

expectations in Spanish language arts and mathematics combined and are not identified as either highest performing schools, focus schools, or priority schools. Based on the number of schools operating in the 2012-2013 school year, this number would be 73 schools. Due to the fact that Puerto Rico is in the early stages of developing a growth model, high progress schools will not be identified until after the 2013-2014 school year.

- **Providing feedback to schools:** Disaggregated growth results will be made available to schools in a variety of ways for inclusion in data reviews and for planning instructional interventions to address the needs of all students in the schools including SWD and LSP students.
- **Evaluating teachers and school directors:** The guidelines for the teacher and school director evaluation systems include a student achievement component. This component is a growth measure that, without bias, takes into account previous student academic achievement when determining the progress the child made during the instructional year. When a growth measure is not possible, the evaluation student achievement measure will be a student learning objective (SLO) outcome. Specific details of the attribution of student performance to teachers and school directors will be included as part of the process in reviewing the results of the pilot teacher evaluation in the SIG schools during the 2012-2013 school year. This component is weighted at 20% of teacher and school director evaluations. This weight will be reviewed as part of the review of the evaluation system every two years (for more see 3A, pages 87 and 92). This will allow for the collection and sharing of student growth data with every teacher and will be used to enhance their instructional practices and inform teacher and school director evaluations.

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

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

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

Overview of Accountability System

Puerto Rico proposes a differentiated accountability model based on the tenets of ESEA that meets the U.S. Department of Education’s guidelines for flexibility as addressed in the documents entitled *ESEA Flexibility* and *ESEA Flexibility Frequently Asked Questions*. This new accountability system, presented here in Principle 2, allows for tremendous transparency. By setting new ambitious AMOs; identifying priority, focus, and reward schools; and supporting and encouraging the 75% of schools in the middle, it is our hope that parents, teachers, school directors, and members of the community will better understand the rationale behind PRDE decisions including the distribution of funds, the justification for categorizing schools accordingly, and the student and teacher progress made within each school.

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

The initiative to serve the lowest 5% of all schools as priority schools, and the next 10% of schools with the largest gaps as focus schools, will enable us to target comprehensive and research-based interventions and expend the necessary funds on the schools and students with the greatest level of need. ESEA flexibility will enable the PRDE to operate under an accountability structure that will better affect systemic change in our lowest performing schools. After 10 years under NCLB, this new accountability structure will support our efforts to turn the tide and truly reform a number of our schools in a concerted manner.

Similarly, rewarding the 10% of highest performing and highest progress schools, and supporting and providing encouragement to the schools in the middle to continue making progress to address the needs of all students, empowers us to catalyze change within school culture island-wide. An incentive system will help schools focus on tangible goals that they can work to achieve while they devote

valuable resources – personnel, supports, time, and money – to closing achievement gaps and improving student performance with all students in all subjects and grades. These goals, while of the utmost importance and a top priority, are often less tangible than rewards and incentives that teachers, students, and community members can see and experience.

We have already undertaken a process of identifying schools in need of turnaround under our SIG funding, but the process of identifying priority, focus, and reward schools represents a solid step toward changing the culture of education in Puerto Rico. These various school categories will help PRDE cast a magnifying glass on the most problematic areas of Puerto Rico’s educational system while shining a light on the most successful. Through this process of identifying weaknesses and successes, we can focus renewed energy and resources on the areas that need them the most.

Under this differentiated accountability model, we will improve our existing USED approved assessment system by developing items that align better to the Common Core State Standards while maintaining our curriculum standards that have been accepted by the University of Puerto Rico system as being of high enough quality and rigor to ensure that students who meet these rigorous standards are college and career ready when they graduate from high school. As evidenced in a letter from the president of the University of Puerto Rico (see attachment 5), high school students who master our rigorous standards will not require remedial coursework once in college. While making these improvements, we will develop and implement (with the assistance of a nationally recognized vendor with significant experience and expertise in assisting states) a growth model that encompasses our state testing program. The growth model will also encompass a series of assessments in the non-tested grades and subjects (that will also be developed by a nationally-known test vendor with significant experience and recognized expertise in developing state assessments) for the purpose of providing student growth data to every teacher to inform instructional practices and teacher and school director evaluations.

In keeping with federal guidelines, Puerto Rico will continue to have rigorous AMOs based on 2011-2012 island-wide performance that will lead to a 50% decrease in the percentage of non-proficient students in each subgroup within 6 years, thereby providing encouragement for all island schools to continue to progress and improve how we educate all children, including students with disabilities (SWDs) and limited Spanish proficient (LSP) students. This model will also encourage schools to close achievement gaps by expecting more improvement in the performance of the lowest-achieving groups of students while still being effective with higher-achieving groups of students. This improvement in student performance will translate directly to more students mastering the curriculum to become college and career ready.

The proposed system will cap the number of priority schools at 5% of the number of schools in the entire island, regardless of Title I status. With only 18 non-Title I schools, this decision has a minimal impact on the number of schools identified but has tremendous impact on the island. This provides a democratic system where all schools, regardless of poverty level, are expected to follow the same path. As an additional piece of context, the inclusion of these schools means that several of our schools that serve students with particular disabilities will be included in the differentiated accountability system. Some examples of such schools are the school for the deaf and the pediatric center serving students whose disabilities are so profound they might otherwise not be able to attend school. These priority schools will be identified based on one of two measures: they will either be the lowest-proficiency schools on the island, based on the PPAA and PPEA which assess public school students in grades 3-8 and grade 11, or they will be high schools with a graduation rate of less than 60%, based on the most

recent two years of data. Although Puerto Rico has not yet had a three-year cohort graduation rate in place, we are transitioning to one (based on the U.S. Department of Education's definition) beginning with the class of 2011-2012. Once it is in place, it will be used for identification of priority high schools. Since a school needs two years of graduation rates below 60%, the first time that high schools will be eligible to be identified as priority schools based on graduation rate will be after the 2012-2013 school year.

Once identified, priority schools will undergo a comprehensive needs assessment and be assigned an external provider to assist the PRDE in ensuring that fundamental changes to the school occur that will address the issues causing the low proficiency rates. The schools will remain in priority identification for a minimum of three years. At the end of those three years, the school may exit priority status if it has met the current AMOs for all subgroups in the school and has achieved a graduation rate above 60%, where applicable. This is a rigorous expectation that will assure the PRDE, the community, and the USED that the schools exiting priority school status have made significant progress. The three year span is necessary to ensure that interventions take hold and become part of the school culture. In each case, the school will use the transformation model, Puerto Rico's preferred school turnaround model, as defined by USED. We have already put structures in place to monitor the majority of schools in this category as a result of our School Improvement Grant (SIG) work.

Similarly, the 10% of all schools that have the largest two year achievement gaps or subgroup graduation rate gaps that are not identified as priority schools will be identified as focus schools. These schools will undergo a comprehensive needs assessment, developed by the Florida and Islands Comprehensive Center (FLICC), and will modify their school action plans for continuous improvement to include significant interventions with the support of the academic program directors in the Office of the Undersecretary of Academic Affairs to address the school factors contributing to these achievement gaps. Once identified, these schools will also stay in their category for a minimum of three years to ensure that the identified interventions take hold and become part of the school culture. At the end of three years, if the school meets all its AMOs and has achieved a graduation rate above 60%, it may exit focus status. Again this is designed to ensure the PRDE, the community, and the USED that the schools exiting focus school status have had a phenomenal change in performance by meeting the rigorous standards that are driving all schools to address the needs of all students, especially traditionally low-achieving subgroups such as SWDs and LSP students.

PRDE will implement systems to monitor both priority and focus schools, at least three times a year, to ensure that these schools are receiving the support they require to meet student needs and address the root causes of their performance problems. This monitoring may include desktop monitoring and site visits. This practice will also ensure that we are developing a culture of communication within schools across the island. As an assurance of appropriate implementation and follow through, the external evaluator will monitor the plans, implementation, and outcomes of focus schools and a subset of the 75% of schools in the middle with the greatest needs.

The 5% of schools that have the highest proficiency rates, and the 5% of schools with the highest percentage of students meeting or exceeding their growth expectations will share reward school recognition. These schools will be publicly acknowledged and will be rewarded in meaningful ways designed to highlight the best practices of these schools and incentivize quality teaching and leadership in other schools throughout the island. Neither highest performing nor high progress schools can be schools that are identified as either focus or priority schools. The PRDE will offer rewards that include public notice on the PRDE website, media attention, letters to parents honoring reward school teachers

and school directors, and district and/or regional events and recognition in the communities in which these schools reside.

Finally, the 75% of schools that are not in any of the other categories under the differentiated accountability system will also undergo a comprehensive self assessment of school needs, developed by FLICC (described on pages 68 and 73), and assisted by the academic facilitators in the PRDE district offices as part of their comprehensive action plan for continuous school improvement. These needs assessments will help schools identify student and school needs to facilitate the identification of appropriate interventions. While the intensity of the interventions will be different than in focus or priority schools, these interventions will address a number of issues that can lead to performance gaps and often hinder the performance of traditionally low performing groups like SWDs and LSP students. District academic facilitators will monitor the application of these interventions with the oversight of the external evaluator to ensure that the schools are appropriately addressing these needs with interventions designed to improve the teaching and learning process for all.

Each school in Puerto Rico is required to develop or modify annually either an action plan for continuous improvement or a school improvement plan. School Improvement Grant (SIG) schools use the school improvement plan (based on the results of a SIG needs assessment) while all others develop action plans (based on the FLICC needs assessment). We have developed integrated technology tools that guide the development of the action plans and collect the data for easy monitoring by the PRDE. These tools include two data dashboard systems:

- Priority schools will use the School Improvement Grant dashboard. Using SIG funds we have developed a dashboard to track progress in our SIG schools on 13 measures. This dashboard was designed specifically to address the needs of SIG schools and is, therefore, well suited for use by the priority schools. The indicators included are useful, but may not be appropriate for schools with less need of support. This dashboard enables the Office of School Improvement to oversee the interventions being implemented in these schools. This tool will also be useful for priority schools as they develop a culture of data utilization for continuous improvement.
- Non-priority schools (i.e. focus schools, reward schools, and the 75% of schools in the middle) will use the PRDE dashboard. This dashboard presents graphic summaries of key data related to schools, students, and personnel. It is currently in the validation phase; once it is fully operational it will first be available to high level central administration personnel. In the next phase of implementation, the Office of the Auxiliary Secretary for Planning and Educational Development will provide access to all schools as an advanced method for data accessibility for use in developing and modifying action plans. Data used for monitoring will be analyzed and disseminated by the Auxiliary Planning Secretary's office.

In making these changes, we will continue to use the subjects approved for use by USED; Spanish language arts and mathematics. We will calculate AMOs for grades 3 through 8, separate from grade 11, with a minimum n size of 30, which we will continue to use under ESEA flexibility. The following seven subgroups identified in the Puerto Rico Accountability Workbook, approved by the USED in 2009, will continued to be used:

1. Economically disadvantaged students (based on family income)

2. Students with disabilities
3. Students with limited Spanish proficiency (LSP)

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

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

We work each day to provide high quality, aligned instruction to the children of Puerto Rico. Our work has led us to improve our standards, improve the quality of our assessments, and implement all applicable regulations. These activities are not enough to improve instruction at the classroom level alone. A variety of professional development initiatives and other projects need to occur to pilot, demonstrate, and ultimately strengthen our instructional practices and strategies to better assist every student in becoming college and career ready. Several of these stepping stones are explained in this section to demonstrate the types of activities we are engaged in to prepare our teachers, school directors, schools, and the SEA to move forward with a new differentiated accountability system.

This differentiated system will allow us to focus our resources on the lowest performing schools and those with the largest achievement and growth gaps. Over time, with targeted interventions and ambitious but achievable academic targets, priority and focus schools will improve to a point at which they exit priority or focus school status. Even though there will continue to be schools in each of these categories, with time the level or degree of need in these schools will decrease as overall achievement and growth improves. Though simply stated, PRDE understands that achieving this goal will take great commitment and determination, and we plan to succeed at making this goal a reality.

With focused attention on the island’s lowest-achieving schools and student subgroups, the implementation of the transformation model including extended learning time, and the flexibility to use a portion of federal funds differently, we believe that our schools will be able to meet the new AMO targets and decrease the percent of non-proficient students by fifty percent in six years.

Over the course of the last few years, the PRDE has initiated a number of projects that will help us meet these new AMO goals. Much of this foundational work has already begun in our SIG schools as well as in a number of other schools that are piloting innovative strategies and practices. These projects lay initial groundwork and will help empower the regions and school districts to drive the changes that will result in improved student outcomes. Our commitment to the island-wide improvement of our schools is also evidenced by our curriculum development work, teacher professional development trainings, instructional coaching, and school culture work, all described below.

Curriculum Documents and Professional Development Boot Camps

As described in Principle 1 (pages 30-31), during the 2010-2011 and 2011-2012 school years, we developed curriculum documents, aligned to the standards, in grades K-12 for Spanish language arts,

mathematics, science, English as a second language (ESL), and core content courses at the high school level. Through this process, we established a stakeholder group of teachers and administrators to engage in the development, review, and approval of the curriculum and professional development activities, and to ensure that these materials were aligned with the 2007 content standards and grade-level expectations. Curriculum materials for grades 4-8 were piloted in six public schools during the 2001-2012 school year.

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

Instructional Coaching and Communities of Practice

One of our goals is to provide direct support to teachers while implementing standard-based instruction. We want to provide our teachers with opportunities to improve their practice so that students then have increased opportunities get greater exposure to high quality academic instruction. During the 2011-2012 school year, we introduced an instructional coaching model to provide teachers with sustained guidance and support in both content and pedagogy as they implement the grade level curriculum frameworks and pacing guides in grades 4-8 in SLA, ESL, mathematics, and science. Teachers from the six curriculum pilot schools received in-classroom guidance and lesson plan modeling four times during the school year. To continue that support, we also established communities of practice to help build capacity within teacher groups, academic facilitators, and school directors by providing them with forums for engaging with their content area colleagues with the purpose of discussing instructional best practices and generating solutions for instructional challenges.

PRDE’s School Culture Project

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

directors. We will be addressing many of these recommendations as districts facilitate the development of action plans for continuous improvement, as the Office of the Undersecretary of Academic Affairs reviews and approves these plans, and as interventions are implemented under this new differentiated accountability system.

Bilingual Pilot School Programs

In addition to the core English as Second language curriculum in grades K-12, Puerto Rico has three initiatives to promote bilingualism in the public school system. These initiatives seek to not only help students achieve acquisition of the English language, but to ensure proficiency for all students, including students with disabilities and limited Spanish proficiency students. We believe that mastery of more than one language and an understanding and appreciation of cultural and linguistic diversity truly can contribute to success in a global society.

These initiatives focus on the importance of developing literacy and communication skills, and represent our commitment to preparing all students for success in the 21st century. Offering students opportunities to engage in a bilingual curriculum will help to develop intellectual curiosity, cultural identity, and opportunities to excel in our global world. The opportunity to participate in a bilingual program should not be an optional or to a small percentage of students but to all students. Both of these initiatives are under the Office of the Undersecretary of Academic Affairs.

- **Empowering Students for the 21st Century (ES21):** This initiative will continue to strengthen existing bilingual schools. The ultimate goal of the existing schools is to have bilingual citizens. This initiative is being implemented in 35 public schools across the island impacting approximately 5,000 students including students with disabilities and LSP students. Twelve of these schools already participate in the full immersion model while the other 23 schools offer special bilingual programs. A total of 83 teachers from these schools are currently enrolled in a certification program in bilingual education at the University of the Sacred Heart (*Universidad del Sagrado Corazón*).
- **The Bilingual Education for the 21st Century (BEC21):** This initiative is being implemented in 32 schools, from kindergarten through grade 2, and impacts approximately 4,800 students and 280 teachers. Under this initiative subject areas Math and Science are offered in English. We are committed in providing these schools with the supports they needs for a successful implementation of this program including four hours of coaching (Monday through Thursday), 102 hours of professional development, innovative instructional materials, extended hours where we encourage parents' involvement, and summer camp. We believe in setting a bilingual environment that begins in early grades with the intention of keep building up these skills as students move on to higher grades. Our goal is to continue implementing bilingual programs in additional elementary schools as they opportunities arise. This initiative BEC 21 is based is on our community desire to provide opportunities of bilingual education in the public schools. The ultimate goal of this project is to offer the opportunity to all students to become proficient in their English language communication skills, therefore increasing their choices on today's global society.

During the 2012-2013 school year, the Bilingual Initiative Program (BIP) being conducted in 34 elementary schools will be adopted by the Office of the Undersecretary of Academic Affairs to fully implement the BEC21 Initiative. Currently, these schools have their own bilingual curriculum and receive some support from the Office of Academic Affairs.

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> <p>a. provide the percentage of students in the “all students” group that performed at the proficient level on the State’s most recent administration of each assessment for all grades assessed; and</p> <p>b. include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.</p>
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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</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</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</p>
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<p>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>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>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 AMOs represent a differentiated reduction over six years. Each subgroup’s AMOs were set on the groups’ 2011-2012 proficiency rates with equal steps (rounded to a single decimal place) leading to a 50% reduction in the percent of non-proficient students within six years. Exhibits 10– 13 reflect the proposed AMOs for Puerto Rico. The AMOs (below) follow the same subgroup system as had been developed for AYP determinations which include the special services categories of poverty, disabilities, and Spanish language learners (as accepted by the USED in the Accountability Workbook, 2009).

<p>Puerto Rico’s Student Subgroups</p>	<ol style="list-style-type: none"> 1. Economically disadvantaged students (based on family income) 2. Students with disabilities 3. Students with limited Spanish proficiency (LSP) 4. Puerto Rican students 5. Hispanic students (other than Puerto Rican) 6. White non-Hispanic students 7. Other origin
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Puerto Rico proposes these AMOs based on two factors, the first being the separation of AMOs for students in grades 3-8 from those for high schools since there is a clear difference in performance at the high school level compared to the lower grades. This separation will allow for more rigorous targets for the lower grades than would have been developed had grade 11 been included. This also allows for

more realistic targets for high schools. The following data tables (see Exhibit 8 and Exhibit 9) help to illustrate the need to separate the grade spans.

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

Exhibit 8. Spanish Language Arts Proficiency

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

Exhibit 9. Mathematics Proficiency

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

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

These 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) in order to better represent the performance of students across the island and hold the lowest performing schools to a rigorous standard.

We 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 whose thresholds have not been modified since the latest approval of the Accountability Workbook (2009). As part of our commitment to promote college participation for all students including SWDs and LSP students, PRDE will 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 as outlined in the recent SLDS grant approved by the USED.

The four exhibits below outline the new AMO targets for each student subgroup, by subject and by grade level, over the next six years (see Exhibit 10, Exhibit 11, Exhibit 12, and Exhibit 13). The new AMOs were developed using 2011-2012 data as the baseline for each subgroup. The 2017-2018 goal of a 50% reduction in the percent of non-proficient students by subgroup was set. The difference between these numbers was calculated and divided by six to determine the equal, annual increases for each subgroup to reach the 2017-2018 goal.

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

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 11. 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 12. Spanish Language AMOs by Subgroup for Grade 11

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

Exhibit 13. Mathematics AMOs by Subgroup for Grade 11

Grade 11 Student Group	Mathematics						
	Baseline 2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18
All	8.9	16.5	24.1	31.7	39.3	46.9	54.5
Students with Disabilities	3.4	11.5	19.5	27.6	35.6	43.7	51.7
Limited Spanish Proficiency	10.3	17.8	25.3	32.7	40.2	47.7	55.2
Economically Disadvantaged	7.8	15.5	23.2	30.9	38.5	46.2	53.9
Puerto Rican	8.9	16.5	24.1	31.7	39.3	46.9	54.5
Hispanic, non Puerto Rican	10	17.5	25.0	32.5	40.0	47.5	55.0
White, non Hispanic	3.8	11.8	19.8	27.9	35.9	43.9	51.9
Other Origin	7.1	14.8	22.6	30.3	38.1	45.8	53.6

2.C REWARD SCHOOLS

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

Selecting Reward Schools

In keeping with the guidelines for the flexibility request as addressed in the USED documents entitled *ESEA Flexibility* and *ESEA Flexibility Frequently Asked Questions*, Puerto Rico plans to identify two categories of reward schools: highest performing schools and high progress schools (as defined in the USED document entitled *ESEA Flexibility*). Each year, we will identify both 5% of our highest performing and 5% of our high progress schools; together these schools will comprise our reward schools.

Highest performing schools are defined as non-focus and non-priority schools that have the highest proficiency in Spanish language arts and mathematics combined and have an attendance rate of 95% or greater in a given year. We will identify annually highest performing schools equal to 5% of the total number of schools in operation. Based on the number of schools operating during the 2012-2013 school year, 73 schools will be identified. These schools are listed in Table 2. The rationale for including the student attendance constraint is to ensure that the highest performing schools demonstrate not just success on test measures but also show success in other areas. Currently Puerto

Rico does not have a three-year cohort graduation rate in place; however we are transitioning to one (based on the U.S. Department of Education’s definition) beginning with the graduating class of 2011-2012. These results will be released in the fall of 2012. Once the results have been reviewed, we plan to evaluate the results and determine how to balance the number of highest performing schools based on proficiency with the number based on graduation rate.

High progress schools are those that have the highest percentage of students meeting or exceeding their individual growth expectations in Spanish language arts and mathematics combined and are not identified as either highest performing schools, focus schools, or priority schools. Five percent (5%) of the total number of schools in Puerto Rico will be identified annually as high progress schools. Based on the number of schools operating in the 2012-2013 school year, this number would be 73 schools. These schools are listed in Table 2. Due to the fact that Puerto Rico is in the early stages of developing a growth model, high progress schools will not be identified until after the 2013-2014 school year. Since Puerto Rico currently does not have a three-year cohort graduation rate, high schools will not be awarded status based on change in graduation rate until after the 2012-2013 school year. Once the rate becomes available, we will determine the balance of schools based on student growth versus those based on change in graduation rate.

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

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

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

Rewarding Highest Performing and High Progress Schools

The PRDE plans to publicly recognize reward schools with meaningful methods that provide incentives to all schools to improve their effectiveness at assisting students to become college and career ready, as evidenced by student achievement or growth. The rewards for high progress and highest performing schools will be the same except for the title of the schools. The rewards managed by the Office of the Undersecretary of Academic Affairs will include:

- 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, and
- allowing schools to select their paint color.

In addition, we will encourage regions and school districts to reward these schools in a manner that will be most significant to the schools themselves (including school directors and teachers), parents

and students, and the community at large. As previously discussed, Puerto Rico functions as a single LEA with a service structure that organizes the island into seven regions, each divided into 28 school districts. This service model allows for several advantages; most pertinent to the reward structure is that the districts are localized and have a strong community relationship. Each district and region is already providing local recognition for schools that have been performing well in the past. It is our vision that this local recognition provides a more meaningful method of recognition than merely the centrally managed methods. These community-oriented branches of PRDE have a stronger link to the communities the schools serve and can customize the recognition methods. Clearly 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.

It is part of the expectation of the Office of the Undersecretary of Academic Affairs that districts and regions will continue recognizing the reward schools in their district. The Office of the Undersecretary of Academic Affairs and the external evaluator will monitor district recognition plans to ensure that they are equitable throughout the islands. To identify methods of local recognition, we solicited input from teachers and school directors at our August regional forums seeking public feedback on this flexibility request. Stakeholders provided valuable insight on the rewards that will be meaningful to schools and their communities.

The PRDE also plans to leverage the knowledge and skills of these schools to model and promote best practices across the island. It is our intent to identify methods to share the great work of these schools and teachers with other professionals and the public. Realizing that cost can be a factor in disseminating the best practices in use in these schools, a number of methods will be investigated including the development of web-based materials about the reward schools, demonstration classroom, and opportunities for effective staff from these schools to present at meetings and conferences.

During the stakeholder meetings, members of the community expressed that incentives for reward schools are a way to recognize the effort of the whole school and therefore should not be individualized. Some of the rewards the public would like to see are: internet access in reward schools, maintenance of existing equipment, and partnerships with businesses and community entities. In addition, stakeholders suggested that reward schools offer workshops to the community on how to support their children at home. Participants also expressed that the recognition and rewards should be significant, resulting in community engagement and participation. To facilitate this community engagement, the Office of the Undersecretary of Academic Affairs will reach out to community leaders, including those from local foundations, businesses, universities, and other sectors of the community at-large, to encourage them to work with local schools. This is the direct result of feedback received from community leaders during the August community leaders' forum.

The overall reward structure serves many 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 effective practices. Second, it provides visibility to the island's top performing schools which can serve as both models and resources for other schools. Third, these rewards honor the hard work of teachers and school directors in these schools, while also acknowledging the important role that parents play in the education of these students. After a number of years of rewarding these schools, the PRDE, the schools, and the communities across the island will have developed a mutual foundation of effective practices used in schools.

2.D PRIORITY SCHOOLS

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

Selecting priority schools

Like many states, Puerto Rico has received a School Improvement Grant (SIG) from the USED. Under the differentiated accountability system proposed here in this flexibility request, these SIG schools will automatically become priority schools. Although there is only one type of priority school, the majority will be SIG schools, which are already in the process of implementing turnaround interventions aligned with the transformation school turnaround model. As these schools have already begun the transformation process prior to the proposed differentiated accountability system, the structure of SIG school will be somewhat different; the remaining priority schools have not yet begun to implement school-wide turnaround interventions aligned with the transformation model, resulting in different implementation timelines for SIG and non-SIG schools. Though the following discussion differentiates between SIG and non-SIG schools, there is but one type of priority school as described below.

Puerto Rico has chosen to include all schools in its differentiated accountability system. To that end, we will identify 5% of our total school population as priority schools. With 1,457 schools in 2012-2013, this number will be 73. Identification is tied to the need to ensure that schools that have been identified have time for the interventions to make a difference in the school and take hold in changing the culture and process of the school prior to the school exiting. To this end, schools will remain priority schools for a minimum of three years once they have been identified. The criteria for exiting as explained in further detail in section 2Dv also includes the school meeting all the AMOs for the year in which the school is attempting to exit.

Due to the exceptional level of support being provided to the priority schools, only 5% of the entire school population will be identified at any time. Thus once the initial identification occurs, different schools will not be placed into priority status until one or more schools exit. Using the method of identification apart from previously identified SIG schools, the schools in the territory will be rank ordered by the average percent proficient for the entire school spanning the two most recent years. The school that is lowest on the list that is not a priority school will be a candidate for identification as a priority school. Any high school with a graduation rate of less than 60%, for the two most recent years, will be identified as a priority school if there is availability on the priority schools list and the school has not already been identified. Should all high schools with a graduation rate below 60% for the two most recent years already be identified as priority schools, then the SEA will identify those schools ranked lowest for average percent proficient until there are 5% of the schools in the territory identified.

The schools currently identified as SIG schools will automatically be identified as priority schools, including one secondary school (grades 7-12) and six high schools (grades 10-12). Their number of

years as a priority school will be counted beginning with their identification as a SIG school. Since there are currently 53 SIG schools, there will be 20 non-SIG schools identified as priority schools for the 2013-2014 schools year upon approval of this flexibility request. In addition, since the 2011-2012 school year will be the first year for which Puerto Rico reports a three-year cohort graduation rate, no high schools will be identified as priority schools based on graduation rate until after the 2013-2014 school year graduation rates are released. At that point identification will be contingent on the availability of slots for additional schools either due to a school exiting identification or expansion in the number of schools increases the number of schools equal to 5% of the schools in the territory.

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

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

The 20 non-SIG priority schools that have been identified using the methodology above will begin to implement interventions in 2013-2014 and will remain in this category for three years. These schools will be eligible for exiting priority status at the end of the 2015-2016 school year.

There is no distinction between SIG and non-SIG priority schools; the only difference is in the timeline of their intervention plans.

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

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

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

Interventions for Priority Schools

Based on several factors including Puerto Rico preference, the only two turnaround models that will be used are transformation and school closure. Of the four school turnaround models defined by the USED, Puerto Rico's preferred model is the transformation model. While closure is a possible option only to a certain extent, students educational needs still have to be attended, leaving only transformation as the viable turnaround model. Implementation of this school turnaround model means that Puerto Rico is implementing interventions that satisfy the turnaround principles as defined in the USED document entitled *ESEA Flexibility*.

To enable a priority school to make dramatic, systemic changes, interventions must be appropriate and give time to make changes to the school. The interventions selected must provide for realistic implementation and oversight. For this reason, the PRDE proposes the following process to develop intervention plans based on individual priority school needs.

Districts with a priority school will be required to prepare an intervention plan for each school that: a) provides appropriate data that aligns with the reporting metrics to support the selection of interventions, b) outlines proposed interventions, and c) details how the interventions will be implemented at the school level. The foundation of these plans is data from a diagnostic self assessment of school needs completed by each priority school. This data will inform the intervention strategies proposed, based on the school's needs and established goals. External providers, selected from the PRDE's list of pre-approved providers, will provide assistance in the priority school improvement planning process. To develop the list of pre-approved providers, the PRDE released a Request for Qualifications (RFQ) and conducted an orientation for potential providers. Interested providers submitted proposals to the Office of School Improvement (OSI). OSI trained both internal and external reviewers on proposal evaluation. Based on the review process, providers were selected and identified for inclusion on the PRDE list of pre-approved providers. Provider involvement and roles are described in more detail below on page 60. Districts will submit new action plans for continuous improvement that include the specific interventions to the Office of School Improvement for review and approval.

Districts offices will help each priority school conduct a diagnostic self assessment of school needs. The needs assessment is based on the SIG needs assessment instrument (see attachment 14). This reflects our effort to build on the improvement efforts we have already made and to streamline resources. The needs assessment will include indicators for four measures of data: student achievement data, process data, demographic data, and perception data (see Exhibit 14). Schools will summarize and use the findings to determine the root causes for intervention and establish goals.

Exhibit 14. Needs Assessment Indicators

1. Student Achievement Data	<ul style="list-style-type: none"> • percent of students at or above proficiency level in Spanish language arts on PPAA (Puerto Rico’s USED approved language arts test) • percent of students at or above proficiency level on PPAA in mathematics • student participation rate on the PPAA in Spanish language arts and mathematics • assessment results for all subgroup
2. Process Data	<ul style="list-style-type: none"> • number of minutes in Spanish language arts courses • number of minutes in mathematics courses • number of non-highly qualified teachers (NHQT) • assignment of teachers to specific classes • teacher attendance rate • attendance rate, period of vacancy or extended absence of school director during previous two years • percentage of staff evaluated, results, and professional development plan • school practices that may interact with student characteristics
3. Demographic Data	<ul style="list-style-type: none"> • dropout rate • student attendance rate • discipline incidences • percentage of Limited Spanish Proficient (LSP) students • graduation rate • teacher attendance rate • number of highly qualified teachers (HQT)
4. Perception Data	<ul style="list-style-type: none"> • staff perception of school • parent perception of school • level of parent involvement

The district will use the data from the needs assessment and work with an external provider to assist the school in developing a new school improvement plan to include specific interventions, with the guidance of trained district personnel. These personnel along with the Office of School Improvement will ensure the alignment of proposed interventions with the needs as identified in the school. Under our current SIG school model, each of our cohort I SIG schools partners with its own provider. There are only a limited number of cases where a provider has the capacity to serve more than one school and is doing so. Providers are selected by the schools from a pre-approved list of providers. Each school began the selection process by identifying their preferred providers based on the schools’ needs and the services

offered by the providers. The Office of School Improvement then reviewed each school's request to ensure alignment between the schools' needs and the providers' services, and approved a single provider to each school.

A team from the PRDE Office of Federal Affairs will be responsible for reviewing the plans to ensure the interventions are aligned to the identified needs of the school and cover these needs adequately. Plans must demonstrate a systemic change in the school and will include: school improvement planning, leadership quality improvement, educator quality improvement, professional development, curriculum alignment and pacing, parent and community involvement, and monitoring plans and processes. Should a proposed plan that has been approved by a district not meet the review criteria, the school will be required to modify its plan and district staff will be required to participate in further development to ensure they develop the internal capacity to carry out this work effectively. In this way, the PRDE proposes a system of tiered support to help schools identify specific strategies and carryout meaningful improvement efforts.

An external provider will be assigned to the school to assist in developing and implementing the school improvement plan to address the school's needs. The school will have the opportunity to select its choice of provider with vetting by the district, region, and the Office of School Improvement. These providers have a great deal of responsibility and mostly work with only one school during the intervention process. They are be expected to:

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

The process and roles for implementation and monitoring once intervention plans are approved is described below.

Interventions will be implemented at the school level according to schools' plans; plans will vary according to school needs and capacity. The Office of School Improvement will assist and oversee implementation of the plan at the school level. Each school has a provider assigned to consistently support the implementation of the interventions and the school improvement plan as a whole. The

process builds off of practice currently in place with respect to Puerto Rico’s SIG schools.

In addition, the Office of School Improvement will collect data to oversee the interventions tracked through a dashboard system designed to monitor progress on a monthly basis. This ongoing data collection is currently being funded with SIG dollars and was developed for use in Puerto Rico’s SIG schools. The dashboard will allow for the tracking of progress on 13 measures toward PRDE, district, and school goals as well as for the identification and dissemination of successful implementation practices and lessons learned. The 13 measures were developed by the PRDE and agreed upon by the USED.

Based on desktop monitoring, annual monitoring of student performance, and teacher evaluation data, when a school is not making progress under the transformation model, changes will be made to the intervention plan to either enhance the interventions already selected, adopt new interventions, or change interventions that are not producing results. This can occur at anytime while a school is a priority school, but must occur if after the end of the initial three year period the school does not meet the exit criteria.

Possible Interventions

While the Office of School Improvement recognizes the need for comprehensive change in all priority schools, the plans already being operationalized in our SIG schools predate this flexibility request. As such, the school improvement plans in these schools have already been developed. The interventions for our existing 53 SIG schools (cohort I and cohort II) will be implemented as originally planned with the monitoring described on pages 77-78. The non-SIG priority schools will implement interventions and supports that, like SIG schools, are aligned with the transformation model of school turnaround. This approach reinforces the idea that there is one type of priority school; the timing is merely different as SIG schools already have intervention plans in place and have begun implementation.

The following provides information related to the possible interventions in non-SIG priority schools. These interventions are consistent with the turnaround principles as defined in the USED document entitled *ESEA Flexibility*.

USED 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;”

The Office of School Improvement requires that a priority school replace its school director as an important element of the transformation model. All of the 29 cohort I SIG schools have replaced their school directors, and the 24 cohort II school directors will be replaced by the 2013-2014 school year. The new directors in the cohort I schools are participating in a Transformational Leadership Director’s Academy during the 2012-2013 school year. This Academy will prepare Puerto Rico’s school directors to lead the transformational changes required to create successful learning communities and increase student achievement.

The new director and new teacher evaluation tools being developed by the PRDE will provide educators with a richer and more detailed view of their performance critical to building and supporting human

capital in the schools and will allow schools to differentiate the job-embedded professional development they can provide to staff.

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

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

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

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

USED 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;"

In addition to the director and teacher evaluations mentioned above, staff will receive ongoing training and support on the implementation of new or revised instructional programs and practices aligned with the school's instructional plan and selected strategies. Instructional support will be provided for staff members, such as observation of classroom practices, in-class coaching, mentoring, provision of structured common planning time, and consultation with external experts.

In order to ensure that job-embedded professional development occurs and that the development is tied to teacher and student needs, the school must ensure that Individual Professional Development Plans for teachers of targeted subgroups include professional development that targets the needs of these subgroups. The school must also ensure that appropriate resources are provided to redesign the

master schedule to allow for common planning time for data driven decision making within the problem-solving process and job-embedded professional development.

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

In order to provide additional time for student learning, priority schools must extend the learning day. Extending the instructional day, week, and year will be used as a strategy to increase student achievement allowing schools to establish academic intervention programs at the moment students begin to struggle with subject content. All 29 cohort I SIG schools have extended learning time by at least 1 hour per day, and a large majority of these schools will also provide summer programs to their students in summer 2013. Schools need to develop and have approved a detailed improvement plan that must include the extension of the instructional day and common teacher planning time and enrichment activities for students.

In order to sustain a school that supports positive student performance outcomes, a school must first create an atmosphere that is safe and conducive to teaching and learning. Surveys will be conducted to help staff identify student, family, and community needs and priorities. Schools will communicate with parents and the community about school improvement status and plans, and resources available such as health, nutrition, or social service providers utilizing newsletters, parent outreach coordinators, and direct mail.

As part of improvement planning, the school is required to recruit representatives from the community to establish a Community Assessment Team. This Team is comprised of a schools’ planning team (made up of the leadership team) and the school council (made up parents and community members). Together, the Assessment Team, district leaders, and the schools’ provider review school performance data, determine the cause for low performance for each priority school, and advise the school on its plan. This structure empowers school stakeholders to take ownership of the schools’ intervention plan and the activities that are carried out in their school. The Office of School Improvement provides oversight of the Community Assessment Team. Should multiple schools in a feeder pattern be in priority status, the same Community Assessment Team will be used for all the priority schools in that feeder pattern. This will ensure vertical alignment of interventions leading to increased internal capacity in the schools.

USED 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;”

Interventions aimed at achieving systemic change, especially in priority schools, are necessary to improve instruction. The plan for priority schools requires that the schools develop and implement comprehensive research-based strategies that have student achievement at the forefront. The strategies adopted must be designed to address a specific need or needs identified through the needs assessment, represent a meaningful change that could help improve student achievement from prior years, and represent a significant reform that goes beyond the basic educational program utilized at the school in prior years.

In order to implement these strategies, the school must ensure that it will utilize instructional materials and practices that are aligned to state standards and review data to determine the effectiveness of all instructional programs and class offerings. The school must also demonstrate how it is aligning its initiatives and resources based upon its specific needs.

USED 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 will drive instruction in schools. Priority schools must ensure real-time access to student achievement data and must develop interim assessments (baseline and mid-year benchmark assessments, and teacher created mini assessments). Data analysis activities must be conducted with the participation of districts, school administration, and teachers following baseline, mid-year, and mini assessments. The school must describe in its improvement plan the interim and summative assessments that will be used, the frequency of such assessments, how the data will be analyzed, and how changes in instruction will be monitored. The plan will also include how instruction will be differentiated to meet the individual needs of students and how such differentiation will be monitored. The Office of School Improvement will provide access to this data through the SIG dashboard system (described on page 44).

USED 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.”

Our schools 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 for 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.

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

Ensuring Implementation

As stated before, PRDE as a whole, is the sole LEA operating in Puerto Rico. Puerto Rico functions as a single LEA with a service structure that organizes the island into seven regions, each divided into 28 smaller districts (academic arms of the PRDE). The Office of School Improvement has chosen to implement interventions for priority schools with all reasonable haste. Simply, the students in these schools cannot and should not be expected to wait another year before their schools begin to improve. The following timelines are either based on current SIG timelines, or the most aggressive timeline that PRDE thinks is feasible. Though the following discussion differentiates between SIG and

non-SIG schools, there is but one type of priority school as previously described on pages 56-57.

Twenty-nine cohort I SIG schools have already begun implementation of the transformational model during the 2011-2012 school year and are required to implement the interventions for the remaining two years.

Twenty-four cohort II SIG schools will begin implementation during the 2013-2014 school year, as approved by the USED, and are required to implement the model for three years. Pre-implementation activities for cohort II schools will begin during the 2012-2013 school year.

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

A description of monitoring activities for priority schools can be found in section 2G on pages 77-78.

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

While compliance and operational monitoring occurs frequently and on an ongoing basis, significant milestones are most easily observed on an annual basis due to the structure of schooling and the systems of assessments involved. The following indicators of progress will be monitored annually for all priority schools and used to make midcourse corrections to the school improvement plan:

- number of AMO targets met and identification of which targets are met compared with previous

years,

- changes in proficiency rates across the school by subject,
- changes in the percent of students making or exceeding their growth target,
- gaps in the percent of students meeting or exceeding their growth targets by subgroup,
- trends of student performance as broken down by teacher (as detailed in principle 3), and
- trends in teacher evaluation results and supports implemented for teachers whose evaluation is below standard.

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

After three academic years as an identified priority school, the school will be eligible to exit, provided it meets all AMOs and has a graduation rate above 60%, if applicable. 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 federal guidelines.

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.

Identifying Focus Schools

PRDE will identify focus schools as the 10% of all schools (PRDE chooses to include all schools in its differentiated accountability model, there are currently only 18 schools that are not Title I schools) that have the largest within-school achievement gaps. These gaps are evidence that the school has work to do to address the needs of at least one of their student groups to become college and career ready. In many cases, the lowest performing student group is comprised of students with disabilities. These schools will be non-priority schools that, based on the two most recent years of performance data, have the largest achievement gaps in Spanish language arts and mathematics. To accomplish this ranking, PRDE will add the largest gap from the most recent year to the largest gap for the same school in the preceding year. These gaps will not necessarily be between the same student groups or even in the same subject from year to year. Schools will then be ranked from highest gap to lowest gap on this measure. The schools that rank highest and are not priority schools will be eligible to be

identified as focus schools. At any time, the total number of focus schools will be equal to 10% of all schools in operation. With 1,457 schools in 2012-2013, this number will be 146. In addition, since the 2011-2012 school year will be the first year for which Puerto Rico reports a three-year cohort graduation rate, no high schools will be identified as focus schools based on gaps in graduation rates until after the 2012-2013 school year graduation rates are released.

The list of schools identified is in Table 2. Once a school is identified, it will remain a focus school for at least three years to ensure that the interventions have time to become part of the school culture. Additional criteria required to exit focus status are contained in section 2Eiv below.

The number of focus schools will not exceed the 10% of all schools (with the limited number of non-Title I schools there is less than one school difference between 10% of all schools and 10% of Title I schools). As such, once the initial identifications are made, additional schools will not be identified until at least one school exits the status. As schools exit, the schools with the largest in-school gaps for the previous two years will be identified based on the rank order of the within-school gaps of non-priority schools.

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

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

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

Process for Identifying Focus Schools Needs

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

- The school will, under the guidance of the Office of the Undersecretary of Academic Affairs, complete the FLICC needs assessment as detailed below in this section.
- The Office of the Undersecretary of Academic Affairs will collaborate with the school in selecting meaningful interventions that address the issues identified by the needs assessment that focus primarily on those needs associated with the performance of those groups of students who are not meeting the level of proficiency associated with higher performing groups.
- The school's action plan for continuous improvement will be modified to include the interventions agreed upon.
- The school will begin the interventions supported by the Office of the Undersecretary of Academic Affairs within the first 90 days after being identified as a focus school.

The Office of the Undersecretary of Academic Affairs will help schools conduct a diagnostic needs assessment, and develop and submit a plan for review and approval by the Office of the Undersecretary of Academic Affairs and the external evaluator. This plan will include the interventions and details on how the interventions will be implemented at the school level. The plan must also demonstrate a change in the school and will include: planning for the improvement of schools, leadership quality

improvement, educator quality improvement, professional development, curriculum alignment and pacing, parent and community involvement, and monitoring plans and processes. The external evaluator will substantiate the selection of an intervention model for each school with appropriate data that align with the reporting metrics. The external evaluator will also oversee the implementation of these plans to ensure that the plans are appropriate, being implemented with fidelity, and having the intended impact on student performance.

Schools will complete a self assessment of school needs, developed by the Florida and Islands Comprehensive Center (FLICC). The FLICC self assessment collects perception data based on classroom observations and surveys of school directors, school administrators, teachers, and students (see attachment 15). After schools complete the self assessment, they will summarize the findings and determine the root causes that require intervention. Then the schools will establish goals. School profiles will consist of leading indicators and other significant data identified by the SEA from those listed in the following chart (see Exhibit 15).

Exhibit 15. FLICC Needs Assessment Indicators

Perception Data	<ul style="list-style-type: none"> • Alignment of instruction, planning, and materials with Puerto Rico’s standards and expectations • Effective teaching strategies • Formative and summative assessments • The use of achievement data • School climate • Parent involvement • Student engagement • School leadership • The needs of special populations (LSP students and students with disabilities) • Teacher evaluations, feedback loops, and professional development • Use of financial and other resources (materials, technology, libraries, etc.)
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The Office of the Undersecretary of Academic Affairs will collect data to oversee the interventions tracked through a dashboard system developed by the Auxiliary Secretary for Planning and Educational Development designed to monitor progress on a monthly basis. This ongoing data collection will allow for the tracking of progress toward PRDE, district, and school goals as well as for the identification and dissemination of successful implementation practices and lessons learned.

Interventions

A comprehensive list of possible interventions is both impossible and impractical, as the interventions must directly correlate to student and school needs. There exists, in the literature on effective practices and school reform, too many possible interventions for such a list. Instead, we will require schools to select research-based interventions (such as those interventions meeting the evidence and impact criteria from the What Works Clearinghouse), that address the issues directly impacting the

achievement and growth gaps in these focus schools. In this way, focus schools will be required to implement interventions that address the needs of the students in their lower performing groups and that are likely to succeed since they are selected locally within the 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.

As part of the planning process to support schools, the school will need to be able to substantiate that the selected interventions meet the following criteria:

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

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

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

- Recruiting and training high performing staff that have demonstrated the ability to improve the performance of those students most in need, often LSP students and SWDs.
- Changing the instructional model to a research based model that has demonstrated particular success with the group of students most in need in the school, possible 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 well being of students.

To further support these schools, the Office of the Undersecretary of Academic Affairs will reach out to community leaders, including those from local foundations, businesses, universities, and other sectors of the community at-large, to encourage them to work with focus schools. This is the direct result of feedback received from community leaders during the August community leaders' forum where participants expressed the desire to work with local schools to support their development.

Monitoring to Ensure Implementation

Ongoing monitoring of the interventions will be a part of the action plan for continuous improvement and will be required for plan approval. The Office of the Undersecretary of Academic Affairs and the external evaluator will audit school records and identify areas where the planned interventions do not appear to meet student learning needs. In those cases, information will be fed back to the school for modification of either the plan or the implementation strategy to ensure success for the students and the school. Focus schools will be responsible for providing their evidences every three months for desktop monitoring of the implementation to the Office of the Undersecretary of Academic Affairs. The external evaluator will monitor the schools directly via site visits at least once a year.

Under ESEA flexibility, the PRDE will shift from having 1,321 schools in various stages of improvement, to 146 schools in focus status. The Office of the Undersecretary of Academic Affairs and the external evaluation will therefore have the capacity to work with schools to monitor implementation of interventions, develop protocols, interpret results of monitoring, and engage in other key oversight activities. The external evaluator will be responsible for oversight of the process for focus schools.

- 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

The Office of the Undersecretary of Academic Affairs will use the same annual indicators and exit criteria for our focus schools as we are using with our priority schools. This ensures uniformity of monitoring and leveraging of resources. We strongly believe, based on work with the UPR, that students who master our standards will be college and career ready. These rigorous exit criteria for focus schools mean that schools are on track with the number and percent of students who are meeting our standards. While compliance and operational monitoring occurs frequently and on an ongoing basis, significant milestones are most easily observed on an annual basis due to the structure of schooling and the systems of assessments involved. The following indicators of progress will be monitored by academic facilitators with oversight by the external evaluator annually for all focus schools and used to make midcourse corrections to the action plans for continuous improvement:

- the number of AMO 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), and
- 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 academic years as an identified focus school, the school will be eligible to exit, provided it meets all AMOs and has a graduation rate above 60%, if applicable. 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 federal guidelines.

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

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

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

Encouragement and Support Systems

The Office of the Undersecretary of Academic Affairs has chosen to include all schools in its accountability system regardless of Title I status. We feel that this is part of our responsibility to ensure that all schools on the island are effective at assisting students in becoming college and career ready. As such, the supports in this section apply to all schools, including the 18 non-Title I schools. There are several layers of encouragements for the 75% of schools in the middle to improve their functioning and assist students in increasing their performance. As part of a comprehensive system, schools have reason to choose to improve. The first layer is professionalism; school staff are generally committed to the education of children and the improvement of their practice and relish the opportunity to improve the effectiveness of their instruction and contribute to increased student outcomes. A second layer of encouragement is the opportunity to be named a reward school. This opportunity is open to all schools

either in the area of performance or growth. We made the decision to base these identifications on a single year so that more schools have the opportunity to be a reward school faster than if multiple years were required for identification, making the goal of being named more achievable to all schools.

Clearly, with differentiated accountability, schools move from being one of a thousand schools not meeting AYP to being one of 73 that are priority or 146 that are focus. With only 15% of schools being identified as being in need of improvement, the stigma attached to these schools is greater, and the desire for a school to make all necessary progress to avoid identification increases.

While school status is no longer annually determined by AMO attainment, reporting will continue. Public reporting of school performance enables parents and the community to hold schools accountable for student and school outcomes. Based on the necessity of these relationships, schools will be driven to demonstrate that they are meeting their AMOs to nurture healthy relationships with their community. We 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 whose thresholds have not been modified since the latest approval of the Accountability Workbook (2009). As part of our commitment to promote college participation for all students including SWDs and LSP students, the Office of the Undersecretary of Academic Affairs will annually publish both the college going and college credit accumulation rates for each identified subgroup that has at least 30 students (in keeping with PR's current approved subgroup size) in each high school in Puerto Rico. This reporting will become effective as the new State Longitudinal Data System comes on-line as outlined in the recent SLDS grant approved by the USED. Additionally, the community will provide pressure on the local school to meet their goals.

Schools that miss AMO's for two consecutive years will be required to demonstrate that the interventions selected in their action plan for continuous improvement align with and have milestones to monitor the needs of the students in the categories that have missed the AMO's. This monitoring will be accomplished by the district with oversight by the Office of the Undersecretary of Academic Affairs. The lowest achieving 5% of the 75% of schools in the middle will be overseen by the external evaluator to ensure that their action plans for continuous improvement address the needs that have been identified by the FLICC needs assessment. In addition, to further support 5% of these schools with the greatest need, the Office of the Undersecretary of Academic Affairs will reach out to community leaders, including those from local foundations, businesses, universities, and other sectors of the community at-large, to encourage them to work with these schools. This is the direct result of feedback received from community leaders during the August community leaders' forum where participants expressed the desire to work with the island's schools to support their development.

Support for the 75% of schools in the middle will come from regional and district personnel. Presently, all schools are required to develop an action plan for continuous improvement which is then reviewed and approved by the district that oversees the school. This strategy will continue, however the methodology will be improved. Each school will be required to annually complete a self assessment of school needs, developed by FLICC. The FLICC self assessment collects perception data based on classroom observations and surveys of school directors, school administrators, teachers, and students. Schools will be assisted in this process by the academic facilitators in the district offices. After schools complete the self assessment, they will summarize the findings and determine the root causes that require intervention. The FLICC self assessment contains the following components (see Exhibit 16).

Exhibit 16. FLICC Needs Assessment Indicators

Perception Data	<ul style="list-style-type: none"> • Alignment of instruction, planning, and materials with Puerto Rico’s standards and expectations • Effective teaching strategies • Formative and summative assessments • The use of achievement data • School climate • Parent involvement • Student engagement • School leadership • The needs of special populations (LSP students and students with disabilities) • Teacher evaluations, feedback loops, and professional development • Use of financial and other resources (materials, technology, libraries, etc.)
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The results of this self assessment of school needs will be used as the basis for the action plan for continuous improvement with particular attention paid to the performance and needs of students with disabilities and limited Spanish proficient learners. The plans will be reviewed by the district academic facilitators who will have been trained on the use of the needs assessment. The action plans for continuous improvement and needs assessment results will be reviewed by the district, who will review the action plans to ensure an alignment between strategies and the needs assessment. Should misalignments be determined, schools will be required to revise their plans and the academic facilitator will be required to participate in more development so that they can directly identify misalignment before approving a plan.

Schools will perform monthly progress assessments as part of their action plans for continuous improvement. However, annual assessments of progress will be made using the following indicators:

- number of AMO 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), and
- trends in teacher evaluation results and supports implemented for teachers whose evaluation is below standard.

Schools not meeting AMOs and not making progress on these indicators will need to modify their action plans for continuous improvement to address the areas of concern. Superintendents and district staff will be responsible for assisting the schools in making appropriate choices of interventions and assisting

in coordinating the implementation of these interventions. The external evaluator will provide oversight of the interventions chosen and the implementation to ensure the interventions approved by the district are appropriate and that the school is implementing them with fidelity.

Monitoring School Performance

Support for the 75% of schools in the middle will come from the district. The external evaluator will provide support and oversight to the 5% lowest achieving school in the 75% of schools in the middle. Presently all schools are required to develop an action plan for continuous improvement which is then reviewed and possible interventions are approved by the district that oversees the school. This strategy will continue, however the methodology will be adjusted as necessary.

Each school will be required to annually complete a self assessment of school needs of school needs. The results of this self assessment of school needs will be used as the basis for the action plan for continuous improvement with particular attention paid to the performance and needs of students with disabilities and limited Spanish proficient learners. The plans will be reviewed by the district staff that will have been trained on the use of the needs assessment as part of their preparation to support focus schools. The action plans for continuous improvement and needs assessment results will be reviewed by the external evaluator, who will review the action plans to ensure an alignment between strategies and the needs assessment. Should misalignments be determined, schools will be required to revise their plans and district staff will be required to participate in more development so that they can directly identify misalignment before approving a plan.

Schools will perform monthly progress assessments as part of their action plans for continuous improvement. However, annual assessments of progress will be made using a variety of indicators including those listed above. This monthly and annual review of indicators will allow for supports customized to school needs and ensure that schools are addressing their needs in a meaningful way.

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

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

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

PRDE Capacity to Support Differentiated Accountability

The PRDE has an extensive support system in place for overseeing, monitoring, and providing technical assistance to Puerto Rico's Title I schools. Unlike most mainland states, the PRDE's structure – with staff at the central, regional, and district levels – facilitates our ability to reach every one of our 1,457 schools by sending staff into each school to provide a variety of services and functions. We recognize the benefits of our structure and intend to capitalize on it in order to support our schools and staff. The Office of the Undersecretary of Academic Affairs, the Office of School Improvement, and the Office of Federal Affairs will each play a significant role in supervising and managing the implementation of the differentiated accountability system. We feel this system will better support schools in assisting students, especially students with disabilities and LSP students in becoming college and career ready.

The Office of the Undersecretary of Academic Affairs is leading the PRDE's efforts to improve student academic achievement and ensure effective instruction and leadership in every school island-wide. As a result, the undersecretary's office is responsible for managing all aspects of this ESEA flexibility request, particularly implementation.

In addition, this differentiated accountability system will be supported by the Office of School Improvement (OSI). Currently, this office oversees and monitors Puerto Rico's School Improvement Grant (SIG) schools. Because these 53 schools will be identified as priority schools under this new differentiated accountability system, OSI will oversee, monitor, and provide support to our 73 priority schools as they implement interventions to improve school instructional effectiveness and student performance through whole school change.

The Office of Federal Affairs (OFA) has tremendous capacity to support this differentiated accountability system. This office has and will continue to provide compliance monitoring in alignment with federal regulations and rules as required by the USED and standard accounting practices. The staff is skilled and will continue to ensure that schools are meeting all federal requirements.

The Office of the Auxiliary Secretary for Planning and Educational Development analyzes data and is helping to develop the PRDE dashboard which will make data and analysis results readily available to focus schools, reward schools, and the 75% of schools in the middle.

The Office of the Undersecretary of Academic Affairs will provide support services to reward and focus schools, and the 5% lowest achieving schools of the 75% of schools in the middle. The external evaluator with national stature and a history of serving on USED peer reviews, work with various state educational agencies, holds a doctoral degree, has a history of providing evaluation services for state education agencies, and a track record of success will oversee the functioning of this new system to ensure that interventions are aligned to school needs, interventions are implemented, the interventions are having a positive impact on student achievement (particularly in those students most in need of assistance), and provide guidance into the type of interventions and the need for improvements in the functioning of the office's support for schools.

Focus schools will be supported by the Office of the Undersecretary of Academic Affairs and the external evaluator. This support will include assistance in completing the FLICC needs assessment, identifying interventions, coordinating the implementation of these interventions, and ensuring that the

interventions are applied and having a positive impact on student achievement.

The 75% of schools in the middle will be supported by the districts, which fall under the Office of the Undersecretary of Academic Affairs. They will assist the non-identified schools in completing the FLICC needs assessment and identifying interventions to address the school's needs. In addition these staff will ensure that schools that miss AMOs for two consecutive years will implement more rigorous interventions to address the school's needs. This process will be overseen by the external evaluator to ensure it is not only being implemented but also that it is having an impact on student performance. The lowest 5% of these schools will be supported by the external evaluator.

Investing in PRDE Staff

System capacity is determined largely by staff experience, staffing levels, and financial resources. To this end, the PRDE will make the necessary decisions to support all activities related to the plans outlined in this flexibility request. In addition, the PRDE is committed to investing further in our staff to ensure that every school is properly supported and has the tools for success.

The explicit plan is for the staff in the Office of the Undersecretary of Academic Affairs to complete training on data driven decision making and aligning school action plans for continuous improvement to the results of needs assessments. The external evaluator will provide oversight and work with all staff to assist them in building their capacity while ensuring schools are receiving interventions and implementing supports to ensure the success of all children, including students with disabilities and limited Spanish proficient students.

The Office of the Undersecretary of Federal Affairs will work to build capacity at the district level to support the continuous improvement process of the 75% of schools in the middle. Each district will create a district-based leadership team composed of the superintendent, improvement personnel at the district level, the superintendent in charge of facilitators at the federal level, technical assistance personnel in charge of selected schools, and any other member of the district that the superintendent deems necessary. This leadership team will develop, support, and facilitate the implementation of policies and procedures that guide school-based teams with direct support systems for each school. The team must monitor the implementation of the action plan for continuous improvement. It must ensure that schools demonstrating the greatest need, based on data analysis and action plans for continuous improvement, receive the highest percentage of resources.

This ongoing data collection (via the PRDE dashboard) will allow for the tracking of progress toward PRDE, district, and school goals as well as for the identification and dissemination of successful implementation practices and lessons learned. The monitoring and reporting that occurs at the state level includes monthly progress monitoring meetings between the district team and schools. In instances where either the school or district does not comply with a required component, the entity will be required to submit an action plan in time for the next meeting detailing the steps it will take in order to meet the required elements.

Building Teacher and School Director Capacity

Professional development activities will be designed based on the results of the evaluation instruments of each teacher and school director as required by *Reglamento* 8035 and *Reglamento* 8036. These professional development and growth opportunities for both teachers and school directors will incorporate professional development vehicles that are research based and shown to be successful in

increasing the teacher and school director effectiveness.

Teachers and school directors will be provided with on-going, high-quality, job embedded professional development that is aligned with school's comprehensive instructional program. The job embedded professional development will incorporate professional development specialists, former teachers and school directors, and identified outstanding current teachers and school directors to impart their knowledge and skills to other professionals. For more information on the types of professional development to support teachers and leaders, please see Principle 3B on pages 99-101.

Priority Schools: Oversight and Monitoring

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

The authority and responsibility for monitoring the implementation of the interventions of priority schools rests with the SEA in the Office of School Improvement. All priority schools are to be monitored annually through on-site and desktop reviews beginning with the 2010-2011 monitoring cycle. To effectively monitor the schools, the SEA created monitoring instruments and trained the SEA Compliance Oversight Unit responsible for monitoring SEA compliance, the Office of Federal Affairs (OFA) Monitoring Unit responsible for supervising and coordinating the Regional Monitoring Units' (RMU) calendars and the Regional Monitoring Units responsible for monitoring the schools. Recurring issues in schools identified by OFA's Monitoring and Regional Monitoring Units are addressed in order to support remediation.

The Office of School Improvement is responsible for ensuring that external providers that assist in implementing the intervention models selected through the state's competitive RFP process are successfully implementing the selected intervention model. Under our current SIG school model, each of our cohort I SIG schools partners with its own provider. There are a limited number of cases where the same provider works with two SIG schools.

Roundtable Committees comprised of SEA representatives and Regional and District staff meet monthly to coordinate monitoring activities and identify appropriate support needed to enable schools to realize school improvement goals.

External auditors are also under contract to verify that external providers receiving SIG funds are complying with their contractual agreements and are aligning services to school needs.

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

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

Focus Schools: Oversight and Monitoring

The Office of the Undersecretary of Academic Affairs will collect data to oversee the interventions tracked through the PRDE dashboard system designed to monitor progress on a monthly basis. This ongoing data collection will allow for the tracking of progress toward PRDE, district, and school goals as well as for the identification and dissemination of successful implementation practices and lessons learned.

Ongoing monitoring of the interventions will be a part of the action plan for continuous improvement and will be required for plan approval. The Office of the Undersecretary of Academic Affairs, with assistance and oversight from the external evaluator, will audit school records and identify areas where the planned interventions do not appear to meet student learning needs. In those cases, information will be fed back to the school for modification of either the plan or the implementation strategy to ensure success for the students and the school. Focus schools will be responsible for providing their evidences every three months for desktop monitoring of the implementation to the Office of the Undersecretary of Academic Affairs. The external evaluator will monitor the schools directly via site visits at least once a year.

Under ESEA flexibility, the PRDE will shift from having 1,321 schools in various stages of improvement, to 146 focus schools. The Office of the Undersecretary of Academic Affairs and the external evaluation will therefore have the capacity to work with schools to monitor implementation of interventions, develop protocols, interpret results of monitoring, and engage in other key oversight activities.

Other Title I Schools: Oversight and Monitoring

While school status is no longer annually determined by AMO attainment, reporting will continue. Public reporting of school performance enables parents and the community to hold schools accountable for student and school outcomes. Based on the necessity of these relationships, schools will be driven to demonstrate that they are meeting their AMOs to nurture healthy relationships with their community. Additionally, the community will provide pressure to the local school to meet their goals.

Support for the 75% of schools in the middle will come from the district. The external evaluator will provide support and oversight to the 5% lowest achieving school in the 75% of schools in the middle. Presently all schools are required to develop an action plan for continuous improvement which is then reviewed and possible interventions are approved by the district that oversees the school. This strategy will continue, however the methodology will be adjusted as necessary. Each school will be required to annually complete a self assessment of school needs of school needs.

The results of this self assessment of school needs will be used as the basis for the action plan for continuous improvement with particular attention paid to the performance and needs of students with disabilities and limited Spanish proficient learners. The plans will be reviewed by the district staff that will have been trained on the use of the needs assessment as part of their preparation to support focus schools. The action plans for continuous improvement and needs assessment results will be reviewed by the external evaluator, who will review the action plans to ensure an alignment between strategies and the needs assessment. Should misalignments be determined, schools will be required to revise their plans and district staff will be required to participate in more development so that they can directly identify misalignment before approving a plan.

Schools will perform monthly progress assessments as part of their action plans for continuous improvement. However, annual assessments of progress will be made using a variety of indicators (indicators can be found on page 73).

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 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 checked="" 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 elements. These elements include but are not limited to the effectiveness of the performance of the teacher as well as the school director. Effective school leadership leads to effective instruction, and effective instruction in turn results in higher levels of student academic achievement. For these reasons, the PRDE is committed to enhancing, adopting, and implementing comprehensive teacher and school director evaluation systems island-wide that focus not only on effective evaluation, but on continuous development of the teacher and school director.

The vision, enhancement, adoption, and implementation of comprehensive evaluation systems is part of our larger strategic initiative to impact student achievement by connecting measures of student performance to the performance of teachers, school directors, and schools, in a fair and appropriate manner. Not only is the PRDE committed to boosting student achievement in a significant way, but we are also dedicated to ensuring that teachers and school directors island-wide receive quality training and professional development to support their growth and improve their practice. These feedback systems are essential to achieving high degrees of student and school success.

Policies Supporting Evaluation and Feedback Systems

Guiding the PRDE's evaluation systems are two *Reglamentos* that outline the processes for evaluating both teachers and school directors; *Reglamento* No. 8036 and *Reglamento* No. 8035, respectively. In June 2011, upon the initial adoption of these *Reglamentos* by the Puerto Rico Department of Education, we began the process of building the teacher and school director evaluation systems by developing evaluation tools for piloting in our 29 cohort I SIG schools. This work was also supported by Law No. 149, which addresses the design of a teacher evaluation system, and Law No. 170, which addresses the design of a school director evaluation system. Both of these laws are known as the Law of Uniform Administrative Procedure. Each of these laws has been codified in a *Carta Circular*.

One year later, in June 2012, the Puerto Rico legislature amended *Reglamento* No. 8036 and *Reglamento* No. 8035 to ensure the improvement of the teacher and school director evaluation assessment instruments to promote continuous professional growth, improve teacher and school director performance, and improve compliance with the achievement of academic goals for all of our students. Both evaluation tools will form the basis of further development to achieve robust teacher and school director evaluation systems composed of several evaluation procedures that will inform and make up an annual evaluation cycle, as described below.

The PRDE Evaluation Process

Current thinking around comprehensive teacher and school director evaluation systems has identified several elements that help to ensure the success of these systems. These elements, or steps, include: 1) starting all performance evaluations with a clearly defined set of performance expectations, 2) the reflection of these expectations in an evaluation instrument, 3) the collection of data through performance observations, 4) formative opportunities to help employees improve their performance, and 5) a final culminating activity such as a summative conference that serves to close the evaluation cycle.

Based on current research and the PRDE's evaluation guidelines, we have developed evaluation tools for piloting in our cohort I SIG schools during the 2012-2013 school year (see attachment 16 regarding

the evaluation implementation timeline). Data gathered after piloting these evaluations may be used by the PRDE to enhance the evaluation instruments in preparation for island-wide implementation. By the 2015-2016 school year, robust teacher and school director evaluations will be fully implemented in every public school. Each PRDE teacher will be evaluated and receive an annual performance rating based on four performance levels, and each school director will be evaluated and receive an annual performance rating based on five performance levels. These performance ratings will also be used to guide opportunities for professional growth and to form the basis for personnel decisions.

The PRDE will implement a cyclical evaluation process that is consistent with national teacher and school director evaluation trends as well as current thinking in this field of study. To this end, the PRDE will use a model that includes the following four steps:

1. beginning of the evaluation process and formation of the committee;
2. visits to the classroom;
3. analysis of the information; and
4. presentation and discussion of evaluation with teacher.

Student achievement will be an integral part of the PRDE evaluation systems, in accordance with the USED documents entitled *ESEA Flexibility* and *ESEA Flexibility Frequently Asked Questions*. Beginning with the 2013-2014 school year, 20% of these evaluations will be based on student achievement. Based on the feedback from stakeholders, the Office of the Undersecretary of Academic Affairs will review this weighting for possible modification over time. Wherever possible, student academic growth will be part of the teacher and school director evaluations. Where it is not possible to measure student growth, student learning objectives (SLOs) will be used as the measure for the student performance portion of the evaluation systems.

To improve instruction and leadership in Puerto Rico's public schools, the teacher and school director evaluations will be tied to systems of support and opportunities for professional growth. These supports will be differentiated to meet the individual needs of personnel.

The Teacher Evaluation System

Highly Qualified Teachers

Carta Circular 9-2011-2012 allows Puerto Rico to comply with federal law and ensure that all students have access to a highly qualified teacher. As a result, the PRDE aims to ensure that all of the teachers that teach the basic academic subjects meet the following requirements: hold at least a bachelors degree, hold a regular teacher certificate, and have demonstrated competence in the subject that he/she teaches. In 2008, the PRDE under the Institute of Professional Development for Teachers established the Professional Standards for Teachers in Puerto Rico. These standards were based on the National Board for Professional Teachers Standards and the Interstate New Teacher Assessment and Support Consortium. The eleven professional standards for teachers in Puerto Rico are as follows:

- Knowledge of the academic subject
- Teaching knowledge
- Instructional strategies
- Learning environment
- Diversity and special needs
- Evaluation and assessment
- Integration of technology
- Communication and language
- Family and community
- Information gathering
- Professional development

Overview of the System

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

- diagnostic, formative, and summative evaluation processes,
- a measure of student academic achievement (growth where possible, SLOs where growth is not measured),
- the development of a professional growth plan for teachers in need of improvement, and
- a connection between the teacher's performance as reflected in the evaluation process and professional development opportunities that are purposeful and help to improve performance.

The comprehensive teacher evaluation system will be linked to a professional growth system that will provide supports to teachers with identified areas for improvement. This evaluation system will also form part of the basis for personnel decisions relating to teachers.

The Evaluation Rubric

The teacher evaluation tool was created with the involvement and participation of teachers from Puerto Rico's four teacher representative groups, the *Asociación de Maestros*, *Unete*, *Educamos*, and *Educadores Puertorriqueños en Acción* as well as a variety of stakeholders including central, regional, and district personnel. During school year 2010-2011, evaluation experts from higher education institutions in Puerto Rico started a process of revision of their current evaluation instrument. After the revision process, this committee of evaluation experts developed the items to be included in the new evaluation system. During school year 2011-2012, the PRDE conducted several meetings with teacher and school organization leaders to obtain input about the newly develop evaluation instruments. Once the revision process was finalized the Undersecretary for Academic Affairs

convened focus groups with school directors and teachers across all seven regions in the island. A total of 34 school directors and 90 teachers participated in these focus groups. Feedback from these focus groups was also incorporated in to the further development of these instruments.

This instrument is organized along three major evaluation domains: (a) effective use of sound pedagogical techniques, (b) professional development tied to teacher performance, and (c) professional responsibilities of the teacher. Only domain one is further expanded into five indicators that reflect specific performance criteria upon which the teacher will be evaluated.

The teacher evaluation rubric was designed using as framework the Puerto Rico (PR) Professional Standards approved in 2008, which is based on the National Board for Professional Teachers Standards (NBPTS) and the Interstate New Teacher Assessment and Support Consortium. The teacher rubric has fifty-four (54) indicators organized in three categories: teaching, professional development, and duties and responsibilities. The teaching category includes six sub-categories and indicators: Curricula (4 indicators), Planning of Learning (7 indicators), Reform Strategies (3 indicators), Learning Process (4 indicators), Evaluation of Learning (6 indicators), Classroom Organization (2 indicators). The professional development category includes seven indicators, and the duties and responsibilities category includes 21 indicators. The teacher evaluation rubric has a point scale of 100 and each indicator scores between 3 and 0; 3 indicates that the teacher exceeds expectations, 2 indicates that the teacher meets expectations, 1 indicates that the teacher partially meets expectations, and 0 indicates that the teacher does not meet expectations.

Purpose

Puerto Rico's teacher evaluation system will strive to:

- Improve student performance through the development and adoption of an effective, comprehensive teacher evaluation system.
- Improve the quality of instruction in each of Puerto Rico's classrooms and schools.
- Improve the teaching and learning process through effective communication practices for teachers.
- Improve the system for providing staff development and training to teachers.
- Establish a comprehensive teacher evaluation system that includes teacher participation.
- Establish a comprehensive teacher evaluation system that will not only serve to effectively evaluate teachers but will also impact students' performance.

Teacher Evaluation Cycle

The PRDE will initially propose a teacher evaluation cycle with six components:

1. The establishment and selection of members that will make up the evaluation committee;
2. The development of an evaluation calendar;
3. Classroom observations;
4. The analysis of the information;
5. A measure of student achievement (growth wherever possible and SLOs when growth is not

possible or practical to measure); and

6. The feedback and discussion of the evaluation results with the teacher.

Each component will follow several procedures and is described in more detail below.

The evaluation committee will provide each teacher with a complete understanding of the evaluation process and the key dates associated with his/her evaluation. Although it is generally agreed that initial meetings between the teacher and evaluator(s) should occur early in the school year, part of the Office of the Undersecretary of Academic Affairs' work will be to set specific guidelines on when each accepted component of the teacher evaluation system is to occur.

Thirty (30) days or before the beginning of the fall semester, the School Director will identify the academic facilitators to support this process. The evaluation process can only be comprised of the School Director and Academic Facilitator of the subject area, as requested by the Director or Teacher. Before sixty (60) days from the fall school calendar the committee will establish the classroom visit schedule, which will be followed. Changes to the schedule are allowed with a justifiable cause. On or before sixty (60) days from the beginning of the fall semester, an orientation will be provided to the teacher on the evaluation procedure and will provide a copy of the classroom visit schedule and the evaluation guide.

All teachers that are appointed after the initial sixty (60) school days will be oriented with respect to the procedure of evaluation during the first ten (10) days of being working in the school.

As part of the teacher evaluation system, teachers will be observed in the classroom by the school director and subject facilitator, as requested by the director of teacher. These classroom observations will help to serve as the basis for the process to reflect on the teacher's understanding of the dispositions and teaching skills required to be an effective teacher and to lead an effective classroom through increased levels of student learning.

The director will coordinate at least two (2) classroom visits. The facilitator of the subject area cannot make the visit by himself/herself. The director can make the visit by himself/herself or be accompanied by the facilitator of the subject area at the request of the teacher.

The initial classroom visit would be used to diagnose each teacher's strengths and areas in need of improvement. To be useful, the results of this visit need to be shared and discussed with the teacher as a means of planning for the second observation. The second observation would occur based on the evaluation calendar guideline and be used to measure the teacher's attainment of the goals set as a result of the formative visit. The results of this second visit will also be shared with the teacher. If the teacher obtains a performance level of partially meets expectations than he/she has the option to request a third evaluation which will be used as a summative assessment.

The evaluation committee is tasked with leading the analysis of the results collected; however, we envision that the data analysis will occur collaboratively with teachers. This analysis would include the classroom and student performance data. We also envision that during this data analysis phase, the

discussion and development of SLOs would occur for those teachers where the use of student academic growth would not be appropriate for measuring student achievement.

The guidelines for the teacher evaluation system will also include a student achievement component. This component will include the use of the new state controlled student assessments tied to the content curriculum for use in the new growth model or the new student learning objectives (SLO) process being developed. Specific details of the attribution of student performance to teachers, the balance of multiple subjects being taught by the same teacher, and other details will be included as part of the teacher evaluation system components.

Beginning with the 2013-2014 school year, 20% of a teacher's evaluation rating will be based on the student achievement component. Based on the feedback from teachers and other stakeholders, the Office of the Undersecretary of Academic Affairs will review this weighting for possible modification over time. In every case, we are developing state controlled assessments that will have consistent rigor and validity across the island for use as the basis for either student growth or SLOs.

In addition to developing and implementing a growth model that encompasses our state testing program, the PRDE will also develop a series of assessment in the non-tested grades and subjects (with the assistance of a national recognized vendor). Puerto Rico will engage in an analysis of the standards for the non-core content areas and grades to identify the most appropriate assessment model for each. In all content areas where it is appropriate, standardized assessments will be developed that can be used as a basis for student growth measures. By developing a regression model that uses individual student prior academic achievement to control for differences in students, the measures used for high progress school identification and teacher evaluation will measure the change in the student without bias. Where the growth model cannot be validated as reliable for monitoring student progress against a norm, PRDE will use a student learning objective (SLO) model. The SLO's will be based on the same state controlled reliable and rigorous assessments as the growth model. It is imperative that the state control these assessments to ensure valid and reliable results across the island that are comparable across schools due to the consistency of the rigor of the assessments. This will allow for the collection and sharing of student growth data with every teacher and will be used to enhance their instructional practices and inform teacher and school director evaluations.

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

Spring 2013	Standards analysis of non-core content areas and grades
Summer 2013 – Fall 2013	Begin item development and SLO protocols and trainings
Fall 2013 – Spring 2014	Field test
Summer 2014	Standard setting, SLO training deployed
Fall 2014 – Spring 2015	Administer assessments

A value added model to measure the contribution and impact of teacher on student academic achievement during a school year will be used. This method will allow the PRDE to match each student's test scores to his or her own previous scores in order to measure the student's progress during the year and not have to wait until the end of the year. The scale of value added will be based

on a five point scale, the value given to each point will be determined during the second year. Value added will enable to determine how much the school and teachers have contributed to student learning compared to other schools and teachers of similar high-need schools. Measuring individual and classroom student gain will be considered.

On the other hand, school-wide performance awards promote professional collaboration, staff collegiality and alignment of organizational and school resources with instructional goals.

Feedback is an integral component of an effective teacher evaluation system and support system. The results of the analysis on teacher performance will be shared with each teacher and will include a summary of a) areas of strength, b) teacher needs, c) areas in need of improvement, and d) recommendations that the teacher should consider implementing to improve their practice. A copy of the evaluation instrument used for the summative evaluation will be given to the teacher. Consistent with national trends in evaluation systems, a final conference with the teacher and evaluation committee will be held towards the end of the year. The teacher will have ten (10) days from the day of the conference to present comments on the results of the evaluation to the evaluation committee.

The evaluation instrument, including the comments of the teacher will be forwarded to the Auxiliary Secretary of Human Resources and filed with the Puerto Rico Department of Education. If required, the PRDE will begin the process of further administrative personnel actions.

If the teacher's summative evaluation results indicate a teacher's performance is rated at the lower levels (partially meets expectations or does not meet expectations), the teacher will be placed on a professional growth plan. This plan will be established by the school director and will encourage the growth and improvement of the areas as identified on the summary of the evaluation results. The plan will have a duration period of two (2) years and should be discussed with the teacher. During the professional growth plan period, the evaluator will request that the teacher demonstrate progress in his/her performance. The school director is responsible for a teachers' compliance with the professional growth plan.

The teacher that is rated at the lower levels (partially meets expectation or does not meet expectations) will be subject to personal actions as corresponds, including disciplinary measures directed to intervene with the deficiencies identified on the evaluation and guarantee the academic achievement of the student.

The teacher evaluation metric of the PRDE requires that all teachers must comply with the functions established under Law Number 149 of July 15, 1999, as amended, and the norms and regulations of the Department. All the teachers are subject to be evaluated on the performance in their professional functions with the purpose to encourage the development and enrichment of the school in benefit of the academic achievement of the students of the public schools of Puerto Rico.

In alignment with the objectives stated in *Reglamento* 8036 we will apply the following evaluation definition and incentive/reward system:

- **Exceeds Expectations:** A teacher who scores between 100% and 95%. A teacher that scores on this level demonstrates a performance that consistently exceeds the expectations for each

criterion in the evaluation. Teacher usually performs within a wide spectrum of behavior in reference of what is being evaluated. The PRDE will encourage these teachers to participate in professional development activities or serve as mentors to their peers. In addition, if funds are available, teachers could be recognized with an incentive.

- **Meets Expectations:** A teacher who scores between 94% and 80%. A teacher that scores on this level presents an adequate professional performance on the criterion being evaluated. The teacher meets with the requirements for the teaching role; however his/her performance is not exceptional. The PRDE will encourage these teachers to participate in professional development activities or serve as mentors to their peers. In addition, if funds are available, teachers could be recognized with an incentive.
- **Partially Meets Expectation:** A teacher who scores between 79% and 70%. A teacher that scores on this level presents a professional performance that occasionally meets the indicators being evaluated. Teachers can be classified within this category when there are some deficiencies that influence performance, although its effect is neither severe nor permanent. The PRDE will require the teacher to participate on professional development activities and evidence progress on their performance.
- **Does Not Meet Expectation:** A teacher who scores lower than 69%. A teacher that scores on this level evidences a performance that shows clear deficiencies on the indicators evaluated and these affect significantly his/her teaching role.

The School Director Evaluation System

Overview of the System

Puerto Rico's comprehensive school director evaluation system will also be consistent with ESEA flexibility requirements and will capture, in rich detail, the work of the school director performing those instructional leadership actions that directly impact student performance (i.e., mentoring, coaching, and working directly with teachers and students). Measures of student achievement will be an integral part of this evaluation system. Student academic growth will be the primary measure; however where growth cannot be measured effectively, SLOs will be used.

Our comprehensive school director evaluation system will connect to a professional growth system that will support struggling directors whose practice is in need of improvement. The school director's evaluation process will serve as part of the basis for personnel decisions relating to school directors.

The Evaluation Rubric

This evaluation tool was created with the involvement and participation of Puerto Rico's National Organization for School Directors (*Organización Nacional de Directores de Escuela de Puerto Rico*) and *Educadores Puertorriqueños en Acción*, as well as a variety of stakeholders including central, regional, and district personnel. During school year 2010-2011, evaluation experts from higher education institutions in Puerto Rico started a process of revision of their current evaluation instrument. After the revision process, this committee of evaluation experts developed the items to be included in the new evaluation system. During school year 2011-2012, the PRDE conducted several meetings with teacher and school organization leaders to obtain input about the newly develop evaluation instruments. Once the revision process was finalized the Office of the Undersecretary of Academic Affairs convened focus groups with school directors and teachers across all seven regions in the

island. A total of 34 school directors participated in these focus groups. Feedback from these focus groups was also incorporated in to the further development of these instruments.

The school director evaluation tool is divided into three major domains including: (a) school director instructional leadership, (b) school director administrative leadership, and (c) school director organizational management and ethics.

The school director evaluation rubric has forty-six indicators organized in three categories: Leadership (17 indicators), Administration (20 indicators), and Organization and Ethical Performance (9 indicators). The school director evaluation rubric has a point scale of 100 and each indicator scores between 4 and 0; 4 being excellent, 3 being good, 2 being average, 1 being below average, and 0 being deficient.

Purpose

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

- Maximize the efficiency and effectiveness of all of the Puerto Rico Department of Education's resources.
- Improve school director effectiveness through a continuous improvement process and through an effective school director evaluation system.
- Provide professional development opportunities for school directors.
- Establish the basis for the improvement of the teaching and learning process through the school director's instructional leadership actions.
- Establish a system that shows the relationship between the work of the school director, the teacher, and the student.
- Serve as the basis for personnel decisions.
- Effectively coordinate with all school districts as a means for improving the teaching and learning process.
- Align with national standards for school administrators such as the Interstate School Leaders Licensure Consortium (ISLIC) 2008 standards.

School Director Evaluation Cycle

The PRDE will initially propose that the school director annual evaluation cycle will consist of six components:

1. The establishment and selection of members that will make up the evaluation committee;
2. The development of an evaluation calendar;
3. The observations and school visits;
4. The analysis of the information;
5. A student achievement measure (growth wherever possible or SLOs when growth is not possible or practical); and

6. The feedback and discussion of the evaluation results.

Further, this evaluation cycle will be informed by the following procedures.

The evaluation committee will provide each school director with a complete understanding of the evaluation process and the key dates associated with his/her evaluation. Although it is generally agreed that initial meetings between the school director and evaluator(s) should occur early in the school year, part of the Office of the Undersecretary of Academic Affairs' work will be to set specific guidelines on when each accepted component of the school director evaluation system is to occur.

Thirty (30) days or before from the beginning of the fall semester, the district superintendent will appoint the members of the evaluation committee. This committee will consist of a maximum of three members who belong to the Superintendent Committee. Before sixty (60) days from the beginning of the fall semester, the team will establish the observation schedule, which will be followed. Changes to the schedule are allowed with a justifiable cause. On or before sixty (60) days from the beginning of the fall semester, the committee will provide an orientation to the school director on the evaluation procedure and will provide a copy of the observation schedule and the guide.

All school directors that are appointed after the initial sixty (60) school days will be oriented with respect to the procedure of evaluation during the first ten (10) days of being incorporated into the school.

Currently, the regulations guiding the school director evaluation process requires that each school director receive a minimum of two on-site school observations/visits, and these observations/visits must be mutually agreed upon by the school director and the members of the evaluation team.

We plan that these observations/visits effectively capture, measure, and provide feedback on the school director's instructional leadership behaviors that directly impact student performance. In this way, each school director observation will be conducted when he or she is in direct contact and in settings when the director is working with teachers, faculty, staff, students, and all other members of the learning community. In addition, these observations will be conducted in a manner in which they are consistent with the evaluation objectives, criteria, and all other instructional leadership actions that impact the teaching and learning process and that form the criteria for evaluation. The proposed criteria consist of the following three domains:

1. School director instructional leadership
2. School director administrative leadership
3. School director organizational management and ethics

We plan that each school director receive an evaluation rating that is divided into at least five (5) rating levels list below ranging from most effective to least effective:

- **Excellent** - A school directors who scores between 100% and 90% in each criteria. A school director that scores on this level exceeds expectations on administrative, academic, and fiscal performance. In addition, a director at this level has a positive influence in others, is a team

player and lead efforts to reach academic and administrative excellence. The PRDE will encourage these directors to participate in professional development activities or serve as mentors to their peers. In addition, if funds are available, schools directors could be recognized with an incentive.

- **Good-** A school directors who scores between 89% and 80% in each criteria. A school director that scores on this level meets the expectations on administrative, academic, and fiscal performance. In addition, a director at this level shows understanding of his/her day to day duties and has the capacity to work in a team. The PRDE will encourage these directors to participate in professional development activities or serve as mentors to their peers. In addition, if funds are available, schools directors could be recognized with an incentive.
- **Average-** A school director who score falls between 79% and 70% in each criteria. A school director that scores on this level occasionally meets the expectations on administrative, academic, and fiscal performance. Although knows his/her duties and responsibilities, this director doesn't perform these duties at their full extent. The PRDE will require these school directors to participate in professional development activities and evidence progress in his/her performance.
- **Below Average-** A school director who score falls between 69% and 60% in each criteria. A school director that scores on this level needs professional help to develop administrative, academic and fiscal skills. His/her performance demonstrates minimal understanding to lead a school effectively. The PRDE will require these school directors to participate in professional development activities and evidence progress in his/her performance. The PRDE could also take further disciplinary actions to address the needs of these school directors to guarantee the students' best academic achievement.
- **Deficient** - A school director who scores between 59% and 0% in each criteria. A school director scoring at this level does not show evidence of administrative, academic and fiscal skills. There is not evidence of efficiency to lead school and does not work collaboratively with the personnel in his/her school. The PRDE will require these school directors to participate in professional development activities and evidence progress in his/her performance. The PRDE could also take further disciplinary actions to address the needs of these school directors to guarantee the students' best academic achievement.

The evaluation committee will analyze the results from the evaluation; however we envision that this process will occur collaboratively with school directors. This analysis should include the observation data, and student performance data including an analysis of student achievement.

The guidelines for the school director evaluation system will also include a student achievement component. This component will include the use of the new state controlled student assessments tied to the content curriculum for use in the new growth model or the new SLO process being developed. Specific details of the attribution of student performance to school directors and other details will be included as part of the school director evaluation system components. Beginning with the 2013-2014 school year, 20% of a school director's evaluation rating will be based on the student achievement component. Based on the feedback from school directors and other stakeholders, the Office of the Undersecretary of Academic Affairs will review this weighting for possible modification

over time. In every case, we are developing state controlled assessments that will have consistent rigor and validity across the island for use as the basis for either growth or SLOs.

In addition to developing and implementing a growth model that encompasses our state testing program, the PRDE will also develop a series of assessment in the non-tested grades and subjects (with the assistance of a national recognized vendor). Puerto Rico will engage in an analysis of the standards for the non-core content areas and grades to identify the most appropriate assessment model for each. In all content areas where it is appropriate, standardized assessments will be developed that can be used as a basis for student growth measures. By developing a regression model that uses individual student's prior academic achievement to control for differences in students, the measures used for high progress school identification and teacher evaluation will measure the change in the student without bias. Where the growth model cannot be validated as reliable for monitoring student progress against a norm, PRDE will use a student learning objective (SLO) model. The SLO's will be based on the same state controlled reliable and rigorous assessments as the growth model. It is imperative that the state control these assessments to ensure valid and reliable results across the island that are comparable across schools due to the consistency of the rigor of the assessments. This will allow for the collection and sharing of student growth data with every teacher and will be used to enhance their instructional practices and inform teacher and school director evaluations.

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

Spring 2013	Standards analysis of non-core content areas and grades
Summer 2013 – Fall 2013	Begin item development and SLO protocols and trainings
Fall 2013 – Spring 2014	Field test
Summer 2014	Standard setting, SLO training deployed
Fall 2014 – Spring 2015	Administer assessments

A value added model to measure the contribution and impact of teacher on student academic achievement during a school year will be used. This method will allow the PRDE to match each student's test scores to his or her own previous scores in order to measure the student's progress during the year and not have to wait until the end of the year. The scale of value added will be based on a five point scale, the value given to each point will be determined during the second year. Value added will enable to determine how much the school and teachers have contributed to student learning compared to other schools and teachers of similar high-need schools. Measuring individual and classroom student gain will be considered.

On the other hand, school-wide performance awards promote professional collaboration, staff collegiality and alignment of organizational and school resources with instructional goals.

Feedback is an integral component of an effective administrator evaluation system and support system. As such consistent feedback of a level identified in the guidelines for the new evaluation system will be provided on a regular basis. This includes (a) areas of strength, (b) school director needs, (c) areas in need of improvement, and (d) recommendations outlining the future work of the school director to improve their practice. Consistent with national trends in evaluation systems, a

final conference with the school director and evaluation team will be held based on the evaluation calendar guidelines being developed by the Office of the Undersecretary of Academic Affairs.

If the school director summative evaluation results indicate a director's performance is rated at the lower levels, the school director will be placed on a professional growth plan. We envision that this plan will be developed by the evaluation committee and will be in effect for a period of two years.

This process will complete the annual school director evaluation cycle, and all documentation relating to the evaluation will be forwarded to and filed with the Puerto Rico Department of Education. If required, the Department will begin the process of further administrative personnel action.

3.B ENSURE LEAs IMPLEMENT TEACHER AND PRINCIPAL EVALUATION AND SUPPORT SYSTEMS

- 3.B Provide the SEA's process for ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, including mechanisms to review, revise, and improve, high-quality teacher and principal evaluation and support systems consistent with the SEA's adopted guidelines.

As previously discussed, Puerto Rico is a unitary system serving as both the state educational agency (SEA) and a single local educational agency (LEA). As such, the island-wide implementation of the teacher and school director evaluation systems and the accompanying support systems, will follow the processes described in *Reglamento* No. 8035 and *Reglamento* No. 8036, as well as those in the Law of Uniform Administrative Procedure.

The PRDE is committed to teacher and school director evaluation systems that are not only consistent with the requirements of ESEA flexibility as outlined by the USED, but also reflect current national trends in the area of teacher and school director evaluation. The PRDE also recognizes that if these systems need adjustment, the process to enhance these systems must be informed by both members of the immediate learning community as well as other educational stakeholders that act as partners in Puerto Rico's public school system.

The involvement of diverse stakeholders in the process of improving these guidelines will provide the PRDE with advantages that will help to ensure the success of our comprehensive evaluation systems. This stakeholder involvement is important because it will help to establish shared ownership of the evaluation systems 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 upon which the evaluation system and instruments will be functioning, is critical so that all data considered in the development process is contextualized to the educational setting. This contextualization will also reflect the collective will of the PRDE, the PR public school system, and the communities served.

Using our existing evaluations and the piloting of these instruments in our cohort I SIG schools as a starting point, additional tools may need to be developed to update our quality, comprehensive evaluation system: these tools include enhanced evaluation instruments and professional growth plan

templates. We plan to review, possibly revise, and if necessary improve these systems every two years. When modifications are required and appropriate, the PRDE will follow the processes outlined below.

Evaluation Systems

Overview of Evaluation Instruments Review Procedures

The piloting of teacher and school director evaluation tools and the first set of two focus group meetings will yield useful information that, should modification be necessary, will enable the Office of the Undersecretary of Academic Affairs to draft modified evaluation instruments that will follow the structure of the current teacher and school director evaluations. Once composed, the drafts would be presented to focus groups during a second set of four meetings for their review and comment. The subsequent presentation of the drafted instruments by the Office of the Undersecretary of Academic Affairs will serve as a member checking process to ensure the validity of the data incorporated into the instruments. This member checking process will also help the facilitators to more accurately refine the data in the instruments while at the same time increasing the confidence in the patterns that emerge in each of the evaluation themes. This process of piloting the evaluation instruments is a requirement of our SIG grant.

Once completed, these instruments would include an expansion of each of the three domains currently found in both the teacher and school director tools, and would list several indicators for each domain that will serve to further define and indicate the specific performance requirements for both the teacher and the school director. In addition, these indicators would allow the evaluation systems to measure, in more objective terms, the performance levels of both teachers and school directors in each domain. It is anticipated that each indicator may consist of the four corresponding levels in the teachers' evaluation system and the five corresponding levels in the school directors' evaluation. If modified, both instruments would be shared with the advisory committee to solicit their input and recommendations prior to approval by the Undersecretary of Academic Affairs.

Advisory Committee on Evaluation Systems

To ensure that Puerto Rico's evaluation systems are appropriate and fair, and that a diverse group of stakeholders are engaged in the enhancement process, the Undersecretary of Academic Affairs will name an advisory committee to provide consultation and input on revising the evaluation guidelines and instruments. This committee will be named during the 2012-2013 school year as the teacher and school director evaluation systems are piloted.

The members of this advisory committee will 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 evaluations, (c) the Council on Education of Puerto Rico, and (d) teacher representative organizations.

Focus Groups: Observation Tools

After the piloting of the evaluation instruments in our cohort I SIG schools, in order to facilitate the development of these instruments for island-wide implementation by the Office of the Undersecretary of Academic Affairs, the Office of School Improvement will assemble two focus groups to provide insight and guidance on the pilot teacher and school director evaluations. These focus groups will consist of no more than 20 members each from the educational community, such as teachers, school directors, academic facilitators, and parents. These members will come directly from the 29 cohort I SIG schools

that are piloting the teacher and school director evaluation tools (information about these evaluations is provided on pages 83-94). As participants in the piloting of these tools, their insights are valuable and will inform any revisions to the evaluation instruments or guidelines. These focus group meetings will be facilitated by the Office of School Improvement, who will analyze share all results with the Office of the Undersecretary of Academic Affairs.

Feedback from the focus group meetings will be used to inform and guide the decision-making processes that the Office of the Undersecretary of Academic Affairs will undertake to revise and improve the evaluation guidelines if necessary. Data collected from the focus group meetings will be used to inform the modification of the evaluation instruments and/or guidelines (e.g., observation instruments and professional growth plan templates) if necessary.

The data obtained from these focus group meetings will be coded and organized into meaningful categories of recurring themes by the Office of School Improvement. This process will ensure the fidelity of the data gathered from focus group participants. Themes identified through the process will be reflected in the instruments if appropriate.

From a research and development perspective, focus group methodologies will offer the PRDE advantages in the implementation of comprehensive teacher and school director evaluation frameworks, as well as the individual instruments that guide these evaluations. More specifically, focus groups will allow the PRDE to gain a variety of perspectives that will provide a balanced viewpoint on the instruments being piloted. These focus groups will also enable us to ensure that stakeholders will have the opportunity to provide their perspective within a social context that will elicit more accurate information. Participants will also have the opportunity to hear what others have to say as well as to consider one's own views within the context of others.

Additional benefits of the focus group process model include: (a) the collection of data in a cost-effective manner, (b) the collection of quality data through peer interactions, (c) the collection of consistent data, which improves data quality, and (d) the establishment of ownership of data that will be use to inform instrument development.

Focus Groups: Validity of Evaluation Tools

In order to obtain information about the validity of these instruments, the Office of School Improvement will hold four additional focus groups with selected practitioners from across the seven regions to enhance them. These focus groups will ask participants to respond to a series of questions that will enable respondents to provide feedback on the content of the observation instruments, as well as the professional growth plan templates.

We plan on following a qualitative design that includes the analysis of data from these focus groups. The Office of the Undersecretary of Academic Affairs will organize the data obtained from these meetings. This data will be coded and organized into meaningful categories of recurring themes. This process will ensure the fidelity of the data gathered from focus group participants. Themes identified through the process will be reflected in the final stages of the revision process of the instruments for affirmation that the theme has been addressed appropriately.

The focus group design will provide significant input from the stakeholder community and will help to ensure the instruments are valid. Focus groups will allow the Office of the Undersecretary of Academic Affairs to gain insight from stakeholders who are familiar with the educational system and its

environment, and will solicit a variety of responses that are rich in detail and relate to the experiences of the focus groups participants. Respondents will also have the opportunity to share their views of the piloted instruments from their own perceptions as well as their point of view without pre-determined categories. Specific attention will be paid to the alignment of the instruments with the professional standards, knowledge, skills, and dispositions the instruments are meant to address.

Support Systems

Professional Growth Plans

The PRDE will develop a professional growth plan template and procedures around the development of professional growth plans as part of the support system for both teachers and school directors. These plans will be based on the identified needs of the educator during the evaluation cycle and will be developed cooperatively with the evaluation team following the island's guidelines for professional growth plans. Evaluation teams will be responsible for listing supports, and establishing timelines and milestones to measure accomplishments in the plans. These plans will have a two year cycle.

Research indicates that poor teacher and/or school director performance can result in lowered student performance. As such, both teachers and school directors should have opportunities to participate in ongoing professional development. This professional development can serve to prevent poor teacher or school director performance, as well as provide supports to teachers and school directors to improve on their practice. For this reason, the enhancement of the PRDE's comprehensive teacher and school director evaluation systems will include the development and adoption of professional growth plan guidelines. These professional growth plans will be designed to align with areas of need and provide targeted assistance to help both teachers and school directors improve their practice.

Consistent with the national trends in educator evaluation systems, the Office of the Undersecretary of Academic Affairs will develop a professional growth plan template and procedures around the development of professional growth plans as part of the support systems for teachers and schools directors.

Advisory Committee and Focus Groups on Professional Support Systems

To develop rigorous professional growth and support systems for teachers and school directors, the Office of the Undersecretary of Academic Affairs will convene a second advisory committee focused on professional support systems. This committee will serve to provide input and recommendations to the Undersecretary and will include stakeholders from the following groups: (a) key PRDE personnel, (b) university and national experts in the area of teacher and school director evaluations, (c) the Council on Education of Puerto Rico, (d) teacher representative organizations, (e) the PRDE Institute of Professional Development for Teachers, and (f) the PRDE Institute of Professional Development for Principals.

Four focus groups of educators as well as district staff will be conducted. These support system focus groups will provide information on the landscape of current support activities and will inform the Office of the Undersecretary of Academic Affairs of gaps in the support systems and suggest modifications to improve both the quality and availability of supports for both teachers and school directors. Once the Office of the Undersecretary of Academic Affairs has developed a draft of the guidelines, a second round of four focus groups will be convened to serve as validation of the proposed modifications.

Aligning Evaluations with Professional development

Professional development activities will be designed based on the results of the evaluations instruments of each teacher and school director as required by *Reglamento* 8035 and *Reglamento* 8036. These professional development and growth opportunities for both teachers and school directors will incorporate professional development vehicles that are research based and shown to be successful in increasing the teacher and school director effectiveness.

Teachers and school directors will be provided with on-going, high-quality, job embedded professional development that is aligned with school's comprehensive instructional program. The job embedded professional developments will incorporate professional development specialists, former teachers and school directors, and identified outstanding current teachers and school directors to impart their knowledge and skills to other professionals.

Upon review of the literature, the Office of the Undersecretary of Academic Affairs has identified a model to guide professional development, comprised of the eighteen strategies identified below in Exhibit 18. This model will be particularly helpful to teachers of mathematics, science, and Spanish; subject areas where Puerto Rico's students struggle the most.

Exhibit 18. Strategies to Guide Professional Development

Aligning and Implementing Curriculum	<ul style="list-style-type: none"> • Curriculum alignment and instructional material selection • Curriculum implementation • Curriculum replacement units
Collaborative Structures	<ul style="list-style-type: none"> • Partnerships with scientists and mathematics in the industry and universities • Professional network • Study groups
Examining Teaching and Learning	<ul style="list-style-type: none"> • Action research • Case discussions • Examining student work and thinking, and scoring assessments • Lesson study
Immersion Experiences	<ul style="list-style-type: none"> • Immersion in inquiry in science and problem solving in mathematics • Immersion into the world of scientists and mathematicians
Practicing Teaching	<ul style="list-style-type: none"> • Coaching • Demonstration lessons • Mentoring
Vehicles and Mechanisms	<ul style="list-style-type: none"> • Developing professional developers • Technology for professional development • Workshops, institutes, courses, and seminars

Leveraging Existing Efforts to Develop Support Systems

In 2003, the PRDE established the Professional Development Institute for Teachers (PDIT). The mission of the Professional Development Institute for Teachers is to promote the human and professional development of teachers. Facilitate the intellectual and professional capabilities and creative through the strategy of capacity building of innovative teaching strategies to encourage the process of teaching-learning.

The PDIT was established to:

- Elaborate public policy on professional development of teachers within the PRSS.
- Identify and collect statistical evidence on the professional development needs of the teachers that are in-service.
- Implement innovative initiatives on teacher professional development.
- Identify best practices, inside and outside of Puerto Rico, on teacher capacity and experiment with those that are the most promising.
- Coordinate efforts with academic programs, Division of Teacher Certification, Office of Career CCCC, and other Institute that are under the Office of the Undersecretary of Academic Affairs.
- Certify the entities, institutions and educational organizations that provide services of professional development to teachers.

The PDIT currently has four professional development programs as outlined in Exhibit 19.

Exhibit 19. PDIT Professional Development Programs

- | | |
|------------------------------------|---|
| 1. Pre-Service | <ul style="list-style-type: none"> • Contribute to the formation of future teachers through an effective teaching practice • Facilitate the collaboration inter-institutional to obtain the professional development of cooperative teachers and student teachers • Collaborate in the strategic planning for the revision of the teacher preparation programs |
| 2. In-Service (new hire 1-3 years) | <ul style="list-style-type: none"> • Develop effective strategies to support those teachers during the first three years • Offer professional development experience focus on the teacher needs • Develop teacher competencies to become a highly qualified teacher • For teachers to improve academic achievement and student growth |
| 3. In-Service | <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 produce professional development programs that respond to the needs of the teacher and student • Promote the support structure of teaching that promotes the continuous professional development, innovation, research, and that evaluation of ideas and practices |
| 4. Highly Qualified Teachers (HQT) | <ul style="list-style-type: none"> • Fulfillment of requirement for HQT • Orient and offer technical assistance to teachers using federal funds for teachers to comply with HQT requirements • Maintain HQT teachers update through professional development programs at their level and within the subject area |

The professional development institute is responsible for providing training to school directors in three areas: academic, administrative, and fiscal. Its vision is to ensure that school directors reach high expectations and make significant changes to their work culture. In order for the institute provide appropriate trainings and supports, they conduct a needs assessment for school directors across all schools. This needs assessment identifies five key leadership dimensions: instructional leadership, planning leadership, administrative leadership, organizational leadership and ethics. After the needs are identified, the institute conducts professional development to school directors according to their needs (e.g., all first year school directors will receive the same training, separate training for schools directors from schools under improvement, specific training for successful school directors, etc.). A variety of modalities for professional development are available such as one day workshops, weekend boot camps, and continuous orientations. The modality of these training sessions will depend mainly on the needs identified. In addition, the institute uses a variety of resources for the planning, development and delivery of professional development services including universities, non-profit organizations, and

PRDE's own resources.

It is important to note that the Transformational Leadership Director's Academy for SIG schools is currently underneath the Professional Development Institute for Principals. This Academy attends the specific needs of these school directors and places an emphasis on enhancing their leadership skills.

The vision of the Institute of Administrative Capacity and School Advisory (IACSA) is to ensure that school directors are strong leaders; have high expectations for student, teacher and school performance; and are able to establish a positive school environment that increases the quality of each school's academic program. The mission of the IACSA is to provide the needed assistance to school directors to effectively perform their functions: increasing management capacities and strengthening the autonomy of the school.

IACSA Service Areas:

- School Councils (Public Policy Law #149) comprising of constitution, certification of the school council, work plan, internal regulations, course of financial operations
- Professional Development: Training, Workshops, Orientations, Academies and Induction to new school directors

Continuous Improvement: Evaluation and Support Systems

We believe that comprehensive teacher and school director evaluation should continuously evolve and should reflect the larger organizational evolution of schools and school systems. For this reason, the development, adoption, and implementation of Puerto Rico's teacher and school director evaluation systems is designed with an underlying foundation for continuous improvement. Every two years, a review of the system will occur to ensure it and its components are still in alignment with nationally recognized models for evaluation and federal guidelines.

PRINCIPLE 4

Provide an assurance that it will evaluate and, based on that evaluation, revise its own administrative requirements to reduce duplication and unnecessary burden on LEAs and schools

Reducing the Burden on Districts and Schools

The PRDE will establish the Burden Reduction Taskforce (BRT) to make recommendations on how to reduce duplication and unnecessary burdens at the district and school levels, thus devoting more time to reaching the goal of college and career readiness for all students of Puerto Rico. The Burden Reduction Taskforce will include the Undersecretary of Administration (task force lead), Undersecretary of Academic Affairs (or representative), Director of the Office of Federal Affairs (or representative), Director from the Planning Office (or representative), Director from the Finance Office (or budget representative), and two members of district personnel. The BRT will meet at least three times during the academic school year and once during the summer. The BRT will develop recommendations to be offered to the Governor and Secretary of Education. During development of these recommendations, the BRT will solicit input from stakeholders including superintendents, content area facilitators, other PRDE administrative staff, school directors, and teachers. The BRT will develop recommendations to reduce duplication and unnecessary burden on districts and schools using the following strategies: building on current initiatives, streamlining procedures, building district capacity, and reducing duplicative efforts.

Puerto Rico has internalized the need for more efficient data systems. We have successfully proposed and received a State Longitudinal Data System Grant to streamline the P-ROW data exchange process (for more on our SLDS grant see page 23). By aligning data systems, the burden of data collection is reduced particularly in terms of data integrity across information systems (the SLDS grant includes the implementation of a department data governance and data quality model). This grant is beginning implementation and over time will improve data processing and access for the educational institutions on the island including schools via the K12 web portal. Also, the PRDE is now validating the PRDE dashboard which will make graphic representation of key data elements available to schools, thus enhancing current data evaluation and decision-making.

The BRT will evaluate statewide systems and establish a mandate-relief program to streamline procedures at districts and schools. Using this mechanism, BRT will examine federal and state accountability systems and align requirements where possible. The BRT will investigate areas where criteria are aligned and will attempt to streamline deadlines and submissions procedures. The BRT will also provide recommendations on how to maintain deadlines on a central master calendar for the PRDE that will also be made available to districts where submissions are required of them. The BRT will further examine the following systems and determine if statewide processes can be improved or developed for each: pupil accounting system, personnel system, student assessment/report card system, and online professional development registration system. The BRT will also review the cycles of all compliance monitoring cycles to determine if they can be lengthened to afford districts some reprieve from the burden of preparation. This will reduce the administrative burden placed on districts and schools by centralizing efforts into statewide processes.

The BRT will also establish a mandate-relief program by reviewing all mandates placed on districts by the PRDE and eliminating any that cannot directly be tied to the goal of college and career readiness or any means to that goal such as reducing spending or improving communication. In developing recommendations, the BRT will consider proposing the elimination of any unnecessary statutes and/or regulations related to school facilities or services.

The BRT will build district capacity by fostering communication and collaboration between districts. This program will increase the autonomy of districts and allow them to pool resources for professional development and staff training. The BRT will consider the development of a web-based resource or database within which districts could communicate about needs for specific training or resources and bring teachers and staff together across districts and regions. This cross-district pooling tool will maximize resources and allows districts to assert independent control over what is necessary in specific schools.

Finally, the BRT will recommend the reduction of duplicative reporting requirements. The BRT will employ a mechanism to consolidate reporting requirements where possible and eliminate any duplicative or unnecessary requirements on districts. The BRT will also explore the use of an automated report submission system that would allow districts to submit reports for feedback before deadlines to ensure they can revise reports before actual submission. Within this system, the BRT would consolidate all district submissions of plans, reports, or other related applications. The BRT will also work to develop report templates or make available report examples from previous years so that districts have a model to use. The automated submission system will also speed up the time of submission and feedback, allowing more time for thoughtful planning and collection of data.

The BRT will be responsible for accepting input from stakeholders and allowing stakeholders to comment on drafts of the recommendations, share feedback, and offer any further ideas on reducing duplication and unnecessary burdens. By reducing duplication and unnecessary burdens on districts and schools using the three mechanisms discussed above, we will allow more time to be dedicated to improving student outcomes.

Attachment 3 – Notice and information provided to the public regarding the request



OFICINA DEL SECRETARIO

9 de julio de 2012

ESEA Plan de Flexibilidad

Durante el 2011 el Departamento de Educación Federal anunció la oportunidad de solicitar la regulación de ESEA, plan de flexibilidad; el cual le extiende a los estados la autoridad para someter una dispensa de un plan innovador de mayor flexibilidad para alcanzar estándares rigurosos. El desarrollo de este plan de trabajo comprensivo tiene como objetivo el permitir mayor flexibilidad en el desempeño académico del estudiante y maestros altamente cualificados. El plan cumplirá con los siguientes principios críticos: la transición a estándares postsecundarios, reformar los sistemas de reconocimiento, de responsabilidad y de apoyo y ofrecer asistencia técnica en el proceso de enseñanza y aprendizaje.

El Departamento de Educación de Puerto Rico participará en el proceso de someter el plan de flexibilidad, con el propósito de mejorar la calidad de la educación de todos los estudiantes del sistema público. Esta oportunidad le permitirá a Puerto Rico enfocarse dentro de las siguientes áreas:

- mejoramiento del desempeño académico de todos los estudiantes en todas las materias
- minimizar lagunas en el aprovechamiento académico
- aumentar la tasa de graduación
- fortalecer la fase de enseñanza y aprendizaje
- mantener continua comunicación con la comunidad escolar

Se recibirán comentarios por escrito al siguiente correo electrónico: paganon@de.pr.gov

Cordialmente,

Edward Moreno Alonso, Ed. D.
Secretario

COMUNIDAD

- Alfabetización
- Educación para Adultos
- Confinados
- Veteranos
- Alianza Corporativa
- Inmigrantes
- Fondos Federales
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PADRES Y ESTUDIANTES

- Cancellation de Estudios y Exámenes
- Educación Especial
- Orientación y Consejería

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PLAN DE FLEXIBILIDAD DE LA REGULACION ESEA

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Elementary and Secondary Education Act of 1965 (ESEA)

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El Departamento de Educación de Puerto Rico participará en el proceso de someter el plan de flexibilidad, con el propósito de mejorar la calidad de la educación de todos los estudiantes del sistema público.

Se invita a la comunidad escolar a someter sus comentarios sobre el plan al siguiente correo:

(b)(6)

• Carta del Secretario sobre el ¹⁰⁶Plan de Flexibilidad ESEA

Attachment 4 – Evidence that Puerto Rico has formally adopted college- and career-ready content-standards consistent with the State’s standards adoption process

