

ESEA FLEXIBILITY PART B MONITORING REPORT

MONITORING VISIT INFORMATION	
State Educational Agency (SEA)	Puerto Rico Department of Education (PRDE)
Request Approved	October 22, 2013
Request Amended	September 19, 2014
ESEA Flex Monitoring Activity	Onsite Monitoring
Monitoring Review Date(s)	January 15-16, 2014
Exit Conference	February 27, 2015
Interviews Conducted	Rafael Román, Enid Madera Toro, Harry Valentín, Ana Alemañy, Marilia Aponte, Vilma Aponte, Vanessa Aponte, Maria Banch, Eli Barrero, Edna Berrios, Maria del Carmen Cruz, Anna Crespo-Feliciano (FLICC), Lisandra Fraderas, Mayra González, Ada Hernández, Julia Keleher (consultant), Alice Lindsay (FLICC), Lydiana Lopez, José Maldonado, Lilia Mirella, Roberto Montañez, Carmen Pereles, Damaris Pérez, Beatriz Philpot, Carmen Pintado, Carmen Rivera, Georgina Rivera-Singletary (FLICC), Carlos Rodríguez Beltrán, Marcia Rodriguez, Vicente Rojo, Ana Rosado, Gloria Rosario, William Ruiz, Sylvette Santiago, Judith Santos, Lilia Torres
U.S. Department of Education (ED) Monitors	Jessica McKinney, Office of State Support (OSS) Megan Oberst, OSS Elizabeth Witt, OSS Diana Yu, Office of Special Education Programs (OSEP)

OVERVIEW OF ESEA FLEXIBILITY MONITORING

The U.S. Department of Education (ED) is committed to supporting State educational agencies (SEAs) as they implement ambitious reform agendas through their approved Elementary and Secondary Education Act (ESEA) flexibility requests. Consistent with this commitment, ED has designed a monitoring process to assess an SEA's implementation of the principles of ESEA flexibility and the State-level systems and processes needed to support that implementation.

Part B Monitoring

In Part B monitoring, SEA implementation of ESEA flexibility was reviewed across several key areas: State-level Systems and Processes, Principle 1, and Principle 2. The State's Principle 3 guidelines underwent peer review in Fall 2014 and as a result additional information was not collected regarding the State's implementation of Principle 3 during this monitoring event. In each broad area, ED identified key elements that are required under ESEA flexibility and are likely to lead to increased achievement for students. Through examination of documentation submitted by the

SEA and interviews with SEA staff, ED assessed the effectiveness of implementation of ESEA flexibility by identifying the extent to which an SEA:

1. Is ensuring that implementation is occurring consistent with the SEA's approved request and the principles and timelines of ESEA flexibility.
2. Is continuing to review and make adjustments to support implementation.
3. Is establishing systems and processes to sustain implementation and improvements.

The report contains the following sections:

- *Highlights of the SEA's Implementation.* This section identifies key accomplishments in the SEA's implementation of ESEA flexibility.
- *Status of Implementation of ESEA Flexibility.* This section indicates whether or not the SEA has met expectations for each element of ESEA flexibility.
- *Elements Requiring Next Steps.* When appropriate, this section identifies any elements where the SEA is not meeting expectations and includes Next Steps that the SEA must take to meet expectations.
- *Recommendations to Strengthen Implementation.* This section provides recommendations to support the SEA in continuing to meet the principles and timelines of ESEA flexibility and strengthening implementation.

HIGHLIGHTS OF IMPLEMENTATION OF ESEA FLEXIBILITY

The SEA's work includes the following key accomplishments relating to the implementation of ESEA flexibility and/or efforts to engage in a process of continuous review and analysis, particularly for those elements receiving a comprehensive review:

- Leaders as well as staff members from the Office of Federal Affairs, Office of Academic Affairs, and Office of Special Education, among many others, demonstrated that they communicate, collaborate, and jointly plan on a regular basis. This integration across offices notably strengthened the work of each as they carry out the ESEA flexibility requirements.
- PRDE has developed a useful online applications tool (PCEA en Vivo) that provides a platform for planning for all schools, but which also clearly delineates particular requirements for priority and focus schools, and for Other Title I schools most in danger of slipping into focus or priority status.
- PRDE has made an exemplary effort in reaching out to the advocacy and parent communities for students with disabilities to ensure that these communities understand the principles of ESEA flexibility and how flexibility serves this student population. The SPED office has worked closely with the Academic Affairs Office and Office of Federal Affairs in PRDE to better coordinate outreach efforts.

STATUS OF IMPLEMENTATION OF ESEA FLEXIBILITY

SEA Systems & Processes

Element	Status
Monitoring (EDGAR 80.40 and 2.G)	Meeting Expectations
Technical Assistance (2.G)	Meeting Expectations
Data Collection & Use (§9304(a)(6))	Meeting Expectations
Family & Community Engagement and Outreach (Implementation Letter)	Meeting Expectations

Principle 1

Element	Status
Transition to and Implement College- and Career-ready Standards (1.B)	Meeting Expectations
Adopt English Language Proficiency Standards (Assurance 2)	Meeting Expectations
Develop and Administer High-Quality Assessments (Assurance 3)	Meeting Expectations
Develop and Administer Alternate Assessments (Assurance 3)	Meeting Expectations
Develop and Administer English Language Proficiency Assessments (Assurance 4)	Meeting Expectations
Annually Reports College-going and College-credit Accumulation Rates (Assurance 5)	Not Meeting Expectations

Principle 2

Element	Status
Develop and Implement a State-Based System of Differentiated Recognition, Accountability, and Support (2.A)	Meeting Expectations
Reward Schools (2.C)	Meeting Expectations
Priority Schools (2.D)	Meeting Expectations
Focus Schools (2.E)	Meeting Expectations
Other Title I Schools (2.F)	Meeting Expectations
State and Local Report Cards (§1111 of the ESEA; 2.B and Assurance 14)	Not Meeting Expectations

Principle 3

Element	Status
Teacher Evaluation and Support Systems (3.B)	PRDE's guidelines under review
Principal Evaluation and Support Systems (3.B)	PRDE's guidelines under review

ELEMENTS REQUIRING NEXT STEPS

Element	Annually Reports College-going and College-credit Accumulation Rates (Assurance 5)
Summary and Status of Implementation	PRDE has not demonstrated that this element is carried out consistent with its approved ESEA flexibility request and the principles and timelines outlined in the document titled <i>ESEA Flexibility</i> . While PRDE has made progress working with the higher education community to collect and report data required for this element, PRDE will not be able to report on all required elements by the 2014-2015 deadline.
Next Steps	As part of its request for renewal of ESEA flexibility, PRDE must amend its ESEA flexibility request to include a plan to annually report to the public, college-going and college-credit accumulation rates for all students and all student groups in each LEA and each public high school. The plan must include information as to which elements PRDE will be able to report no later than in the reports based on data from the 2014-2015 school year. The plan and timeline must also include information as to when elements on which PRDE will not be able to report in 2014-2015 will be reported.

Element	State and Local Report Cards (§1111 of the ESEA; 2.B and Assurance 14)
Summary and Status of Implementation	<p>PRDE has not demonstrated that this element is carried out consistent with its approved ESEA flexibility request and the principles and timelines outlined in the document titled <i>ESEA Flexibility</i> or §1111 of the ESEA.</p> <p>PRDE’s most current SEA and school report cards include data from the 2013-2014 school year. However, these report cards do not include all required information consistent with §1111 of the ESEA and ED’s February 8, 2013, report card guidance. In particular, the State report card (also the “LEA report card,” given Puerto Rico’s unitary system) lacks disaggregated student achievement data in reading/language arts, mathematics, and science; does not include the percentage of students not tested for reading/language arts, mathematics, and science; does not include the number of recently arrived Spanish learners exempted from the reading/language arts assessments; is missing the percentage of students at each achievement level on the NAEP mathematics assessment at grade 4 and 8; does not show the comparison between actual achievement and PRDE’s annual measurable objectives (AMOs) nor whether the AMOs were met for reading/language arts or mathematics for all categories except “all students” (i.e., major racial and ethnic groups, students with disabilities, Spanish learners, and economically disadvantaged are not broken out); and no information was included about “other academic indicators” for elementary and middle school.</p> <p>The school report cards too are missing numerous required pieces of data: student achievement is disaggregated only at each grade level but disaggregated data are missing for the school overall for reading/language arts, mathematics, and science; achievement compared to the SEA is present only at the grade level for the “all students” group, but it is missing entirely for subgroups at the school level for reading/language arts, mathematics, and science and is not available at</p>

Element	State and Local Report Cards (§1111 of the ESEA; 2.B and Assurance 14)
	the school level; the percentage of students not tested for reading/language arts, mathematics, and science is also given only at each grade level but not for the school overall (and it is unclear whether the Limited Spanish Proficient (LSP) category includes only current LSP students or if it also includes former LSP students who have exited such status); the number of recently arrived Spanish learners exempted from the reading/language arts assessment is missing entirely; the report card does not show the comparison between actual achievement and PRDE's annual measurable objectives (AMOs) nor whether the AMOs were met for reading/language arts or mathematics for all categories except "all students" (i.e., major racial and ethnic groups, students with disabilities, Spanish learners, and economically disadvantaged are not broken out); and no information was included about "other academic indicators" for elementary and middle school.
Next Steps	As part of its request for renewal of ESEA flexibility, PRDE must submit a plan and a timeline for releasing State and local report cards for the 2015–2016 school year, which will include data from the 2014-2015 school year, that include all information required under ESEA §1111 and are consistent with ED's February 8, 2013, report card guidance.

Element	Teacher and Principal Evaluation and Support Systems (3.B)
Summary and Status of Implementation	On October 14 and 15, 2014, two expert peers reviewed PRDE's Principle 3 guidelines for teacher and principal evaluation and support systems, as well as corresponding changes to the Principle 3 of PRDE's request. In a December 19, 2014, letter from ED to PRDE, Assistant Secretary Deb Delisle indicated that PRDE had not yet adopted guidelines for teacher and principal evaluation and support systems that meet all requirements of ESEA flexibility, nor does it have a process for ensuring that schools in Puerto Rico develop, adopt, pilot, and implement teacher evaluation and support systems consistent with those guidelines as required under ESEA flexibility. This letter also provided PRDE with feedback from that peer review identifying strengths, revisions that may be needed to meet Principle 3, and technical assistance suggestions.
Next Steps	As indicated in ED's December 19, 2014, letter, through the process for renewing the SEA's ESEA flexibility request, PRDE must submit to ED an amended request incorporating final guidelines for teacher and principal evaluation and support systems consistent with all requirements for these systems under Principle 3 of ESEA flexibility and consistent with the renewal requirements pertaining to Principle 3 described in the document titled <i>ESEA Flexibility Guidance for Renewal Process</i> (Nov. 13, 2014).

RECOMMENDATIONS TO STRENGTHEN IMPLEMENTATION

The following recommendations are provided to support the SEA in continuing to meet the principles and timelines of ESEA flexibility and strengthening implementation through continuous improvement and establishing systems and processes to sustain implementation and improvement.

- While the PCEA en Vivo system seems user-friendly for schools, it appears to be less so for SEA and district staff. PRDE should consider ways to systematize its use of the information schools enter into the PCEA. PRDE should also systematize its work with schools on the planning process. For example, as PRDE is unlikely to be able to sustain the level of technical assistance on using the system that it provided to schools in this first year; it should look for ways to differentiate system training. PCEA en Vivo has the capacity to make strategic planning the standard way that schools in Puerto Rico do business if PRDE continues to emphasize, systematize, and reinforce its use at the school, district, and State levels. PRDE should also examine ways to automate the PCEA system so SEA staff see system-wide, real-time school progress submitting applications and implementing strategies.
- PRDE should consider integrating programmatic and fiscal monitoring. Both need to occur, but they are currently happening separately and not informing one another as well as they could. Explicit process points for collaboration/integration would help.
- PRDE should consider streamlining the ways schools receive technical assistance to remove some of the hierarchy and layers in the current structure. Streamlining will help ensure that school directors and teachers get consistent messages about reform plans and procedures as well as manageable feedback that they can immediately incorporate into their practice.
- PRDE should consider making a user-friendly summary of the PCEA publicly available to include stakeholders who may be interested but may not want to review lengthy versions. PRDE should also consider ways to make school-level data useful and easy to understand for stakeholders, including parents. While PRDE has extensive data, it currently presents those data in ways that may be overwhelming to non-educators.
- PRDE should increase its outreach to the LSP community, particularly parents of LSP students. While PRDE has a plan for outreach to this community, it is in the early stages of implementation and could be strengthened. For example, PRDE should consider adapting some of the measures it has used successfully in reaching out to the advocacy community for students with disabilities for use with the LSP community.
- When implementing its educator evaluation system, PRDE should pay careful attention to training educator evaluators so they evaluate all educators consistently. This will require substantial initial training, ongoing calibration, and regular norming and re-training.
- Similarly, PRDE should rigorously train and monitor its facilitators in order to provide consistent high-quality support across schools. Those who evaluate facilitators will also need careful training, calibration, norming, and re-training, so that PRDE has accurate information about the quality of the work facilitators do. Since facilitators are central to PRDE's ESEA flexibility plans, PRDE needs such information to inform continuous improvement so all schools receive consistent technical assistance and monitoring as they implement the State's ESEA flexibility plans.
- PRDE should consider partnering high-progress reward schools with focus schools for leadership mentoring and learning.
- As appropriate and necessary, PRDE may wish to consider using Title IIA funds for coaching and specialized professional development related to implementing its ESEA flexibility request.