

Puerto Rico Department of Education
Targeted Monitoring Review of School Improvement Grants (SIG) under
Section 1003(g) of the Elementary and Secondary Education Act of 1965
February 10-14, 2014

SCHOOL IMPROVEMENT GRANTS (SIG) MONITORING REPORT FOR PUERTO RICO

<u>BACKGROUND</u>				
Models	Number of SIG Schools Implementing the Model - Cohort I		Number of SIG Schools Implementing the Model - Cohort II	
	Turnaround	0		0
Transformation	29		22	
Restart	0		0	
Closure	0		0	
Tier	SIG-eligible Schools	SIG-funded Schools	SIG-eligible Schools	SIG-funded Schools
Tier I	63	29	34	22
Tier II	0	0	0	0
Tier III	1193	0	1193	50

<u>MONITORING TRIP INFORMATION</u>	
Monitoring Visits and Award Amounts	
SEA Visited	Puerto Rico Department of Education
Total FY 2009 SIG Allocation	\$132,843,889
Total FY 2010 SIG Allocation	\$20,755,917
Total FY 2011 SIG Allocation	\$18,217,785
Total FY 2012 SIG Allocation	\$14,875,514
School Visited	Ramón Power y Giralt
School Information	Model: Transformation Cohort: 1 School-Level Award: \$5,393,385
School Visited	Alejandro Tapia y Rivera
School Information	Model: Transformation Cohort: 2 School-Level Award: \$1,300,000
School Visited	Jesús Rivera Bultrón ¹
School Information	Model: Transformation Cohort: 1 School-Level Award: \$3,251,202

¹ While this school was visited by the U.S. Department of Education staff, in-depth interviews were not conducted as it was not one of the two primary SIG schools selected for this site visit.

LEA Visited	San Juan 1 and San Juan 2 School Districts
LEA Information	Cohort 1: 3 schools awarded \$15,555,831 Cohort 2: 11 schools awarded \$ 14,850,000
Staff Interviewed	
➤ SEA Staff:	Office of Federal Affairs (OFA) Director, Director Office School Improvement, Coordinator Unit of School Improvement
➤ School #1 Staff:	Principal, School Leadership Team, 5 Teachers, 7 Parents, Students, and 4 Classroom Visits (Ramon Power y Giralt)
➤ School #2 Staff:	Principal, School Leadership Team, 5 Teachers, 6 Parents, Students, and 8 Classroom Visits (Alejandro Tapia y Rivera)
➤ San Juan #1 Staff :	Superintendent, Assistant Superintendent, Facilitators and Technical Assistant Personnel
➤ San Juan #2 Staff:	Superintendent, Assistant Superintendent, Facilitators and Technical Assistant Personnel
• School #3 Staff:	Principal, School Leadership Team, 3 Teachers, 4 Parents, Students, and 3 Classroom Visits (Jesus Rivera Bultron)
U.S. Department of Education Staff	
Staff Onsite	Christopher Tate & Christina Weeter

OVERVIEW OF MONITORING PROCESS

The following report is based on U.S. Department of Education’s (Department or ED) on-site monitoring visit to Puerto Rico from February 10-14, 2014 and review of documentation provided by the State educational agency (SEA), local educational agencies (LEAs), and schools. It should be noted that the Puerto Rico Department of Education (PRDE) acts as both the SEA and the LEA and references to “the district” refer not to the LEA or PRDE but to the seven educational regions, divided into twenty eight (28) school districts including San Juan I and San Juan II. The districts’ role in Puerto Rico differs from the traditional role of the LEA in other states and no SIG funds are retained at the district level to support the schools’ implementation of the SIG reforms.

The *School Improvement Grant (SIG) Monitoring Report* provides feedback to PRDE on its progress in implementing the program effectively, and in a manner that is consistent with the SIG final requirements, authorized by Section 1003(g) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended, and as explained further in *Guidance on Fiscal Year 2010 School Improvement Grants Under Section 1003(g) of the Elementary and Secondary Education Act of 1965 (March 2012)*. The observations and descriptions illustrate the implementation of the SIG program by the SEA, districts, and schools visited; initial indicators of success; and any outstanding challenges being faced in implementation. The report consists of the following sections:

- **Background Information:** This section highlights significant achievements in PRDE's implementation of the SIG grant. This section also includes a brief overview of PRDE's structure and vision for SIG implementation.
- **Summary of PRDE's Implementation of SIG Critical Elements:** This section provides a summary of the SEA's progress in implementing SIG and is based on evidence gathered during the monitoring visit on February 10-14, 2014 or through written documentation provided to the Department.
- **Technical Assistance Recommendations:** This section addresses areas where additional technical assistance may be needed to improve the quality of SIG program implementation.
- **Policy Recommendations:** This section addresses policies that should be revised by the SEA to better support SIG program implementation.
- **Monitoring Findings:** This section identifies areas where the SEA is not in compliance with the final requirements of the SIG program and indicates required actions that the SEA must take to resolve the findings.

BACKGROUND INFORMATION

Highlights of Puerto Rico's Implementation of SIG

PRDE Highlights

- PRDE has developed a rigorous process and online tool for monitoring each school's transformation activities aligned to the contractually obligated work of the providers.
- PRDE is working with the Florida and the Islands Regional Comprehensive Center (FLICC) to develop a district level structure for supporting the implementation of SIG that will align technical assistance activities and provide an arm for better oversight by PRDE of SIG in each school district.

San Juan I School District/Ramón Power & Giralt High School Highlights

- San Juan I District has created a clear vision for the schools in this district and meets with the schools' external providers monthly to monitor the implementation process for each of the schools and discuss how the district can support the work, including providing direct assistance to the principals. The district provides capacity building workshops focused on instruction and invites the external provider coaches to join the districts in classroom visits to compare observations.
- Ramón Power & Giralt High School has a well-defined focus on academic achievement. Each classroom had PRDE's four pillars of transformation and the current learning standard and objective displayed, which truly seemed to guide the classes. The principal uses a data wall and has implemented strategies he observed on visits to Chicago Public Schools classrooms.
- Art class projects incorporate concepts of math (e.g. geometry) and literature. The Barbering and Cosmetology programs are popular with students and the school plans to open a co-op to provide these services to community members; students have won competitions and the

instructor competes internationally. Teachers of these programs work with students to help students meet licensing requirements and are doing outreach with local businesses to hire graduates despite the stigma of coming from that community (which is the largest public housing project in Puerto Rico).

- Student, teacher, and parent interviews indicate a clear positive change in school climate and, as a result, this school is now one that students want to attend and one where parents want to send their children.

San Juan II School District/Alejandro Tapia Rivera Elementary School Highlights

- The Principal of Alejandro Tapia Rivera Elementary School has worked to build community partnerships to improve the school. She has engaged the Mayor of San Juan to help with much needed structural/capital improvements to the school grounds. A partnership has been developed with the private school next door to provide additional music education after school. Additionally, each classroom has a “grandmother” who volunteers in the class.
- Teachers never had any kind of evaluation prior to the implementation of SIG, nor created syllabi for the classes. Teachers now receive evaluation and/or coaching every day and create syllabi in accordance with PRDE policies.

Jesús Rivera Bultrón Middle School Highlights

- While school enrollment had been declining and the morale of staff was low, academic interventions and community outreach have improved perception of the school within the community and enrollment has increased by 15%. Teacher attendance and morale – both a considerable problem before the transformation – have improved.
- School staff feel supported by their provider, Carnegie Learning, but feel more support is needed from the district.
- The school has implemented several strategies to improve school climate and non-academic supports for students. A parent survey informed the development of parent workshops and community activities to enhance school climate and strengthen family engagement, particularly through helping parents to support their child’s learning at home. The social worker and school counselor assessed students for social-emotional needs and implemented interventions to address chronic student absenteeism, discipline issues, and the need for building positive staff/student relationships that resulted in improved student attendance and academic achievement.

PRDE Structure

Between employees and contractors, PRDE has twelve staff dedicated to working on SIG implementation full time. These positions are assigned to the Office of Federal Affairs.

PRDE has changed its structure as a result of SIG implementation. The Director of the Office of School Improvement has been appointed to serve in an instructional support and oversight role for SIG and acts as a liaison with the Office of Academic Affairs. Further, PRDE is restructuring the work of its district offices and investing in the development of the capacity of these offices to support the implementation of SIG.

SUMMARY OF PUERTO RICO'S IMPLEMENTATION OF SIG CRITICAL ELEMENTS

Application Process

During fiscal year (FY) 2013, PRDE did not make awards to districts in accordance with the timeline in its approved SIG application. In its approved application, PRDE states that awards will be made to eligible schools in April of 2013. This occurred due to guidance from the Department regarding the resolution of prior monitoring findings. The second cohort of 72 Tier I and Tier III SIG schools was notified of their approval in June of 2013 to begin full implementation at the start of the 2013-2014 school year.

In interviews, district and school staff stated that PRDE supported districts and schools through the application process by providing feedback on school transformation plans and providing technical assistance on preparing school budgets. PRDE was also supportive of working with schools to ensure that the selected provider was a strong fit to meet each school's needs as well as ensured that providers had the capacity to fully support each school it intended to serve.

PRDE's application approval process, however, does not significantly determine the capacity of the school to implement the transformation model. As a result, six cohort one schools that received a SIG award were not prepared to fully implement the transformation model at the start of the 2011-2012 school year because a principal had not been hired by PRDE. Additionally, Tier I cohort two schools did not fully implement the SIG program for the first quarter of the 2013-2014 school year while assigned external providers conducted needs analyses of the schools to ensure the schools' transformation plans aligned to their needs.

Since awarding the grants, PRDE has received requests from schools to amend their SIG applications, referred to by PRDE as School Transformation Plans. The process for amending school transformation plans is captured through PRDE's online monitoring tool. When providers update implementation plans PRDE reviews and approve changes to turnaround strategies for each school after which those changes are entered on the online monitoring tool.

Implementation

San Juan I School District/Ramón Power & Giralt High School (Cohort 1 School)

Teacher and student absenteeism, school safety, math and English proficiency, graduation rates, and parental involvement were identified as major areas of concern in the school's transformation plan. The SEA noted in its monitoring report that the school is showing progress in these areas and is implementing interventions consistent with the transformation plan.

There is an increase in teacher and student attendance including increased student participation in extended learning time activities that focus on career and occupational exploration, integrating core subject standards. The school has several vocational offerings that are linked to helping students obtain licensures and apprenticeships upon graduation. The principal cites having students work in teams as one of the strategies that has increased attendance because the students understand that if they are absent or don't contribute they will be letting their team down as well

as themselves. Once a month they hold a school-wide reflection ceremony that incorporates student recognition.

There are gains in Spanish and English performance on the Pruebas Puertorriqueñas de Aprovechamiento Académico (PPAA) test with fewer students testing at the bottom two levels of competency; however math proficiency is still a concern. The principal has established a culture of using data to drive instruction. The principal has his own data wall and data binder along with observations records for each teacher observation. The principal meets with data coaches and they provide joint feedback to teachers on their practices. Data walls exist in each classroom and teachers are working to make the data more relevant to the students. For example, they help students understand how many questions are on each assessment and how many they must answer correctly to demonstrate proficiency.

Parent and community engagement has shifted from parents previously not being allowed to come to the school toward working with a community organization to create a Volunteer Parent club and “parent room” to promote parent engagement. The school uses engaged parents to recruit additional parents to become more engaged with the school. Parent and community workshops were designed by the social worker and an external provider including an Intergenerational Bridge Project, which involved students interviewing elders from the community. Students also initiated efforts to address the rampant violence in the surrounding community, which is the largest public housing project in Puerto Rico. Along with community leaders they held a “Walk for Peace” which helped unify the community and resulted in a call for peace.

San Juan II School District/Alejandro Tapia Rivera Elementary School (Cohort 2 School)
English, Spanish, math and science proficiency; teacher engagement and capacity; parent engagement as well as core content textbooks, basic equipment, supplies, and infrastructure improvements were identified as the major areas of concern in Rivera’s needs assessment.

To address some of the needs related to school infrastructure and equipment the principal has engaged the Mayor of San Juan to repair and repaint school structures, including such things as removing rocks from the grounds of the play areas; partnered with a nearby school for photocopying; and partnered with the Boys & Girls Club to provide academic tutoring and sports activities. She also built a partnership with Juan Bosco Private School to provide an after-school music program that brings in Juan Bosco music students to support the Rivera music teacher and students.

It’s not clear yet that there has been an increase in proficiency in the core content areas at this time as Cohort 2 school’s PPAA results will be available in June, 2014; however, the school has implemented strategies to improve instruction. Increased learning time for all students in grades K-6 takes place from 3:15-5:15pm Monday through Thursday and includes Spanish, math, literacy, journalism, science, English, fine arts, and sports on a rotating basis where students have one class in each of these areas once every two weeks.

The Principal and external provider have worked to increase teacher capacity and engagement through increased collaboration time for teachers, training on data driven decision making,

individual coaching with a subject specialist, and frequent observations paired with timely feedback from the Principal. Prior to the transformation teachers were never evaluated and were not required to create a syllabus for their classes. The Principal has focused on getting teachers to plan each lesson in accordance with PRDE's policies. Teachers now report receiving evaluation and coaching every day. Specialists coach the teachers to help them with their planning process, and analysis of student data to tailor instruction to the needs of the individual students, and to share resources to improve their teaching practices. There are weekly meetings between the teachers, specialists, and principals to compare observations and provide professional development based on the pillars of transformation outlined in the SIG application and strategies specified in the school's Transformation Plan. The principal has sought input from both the teachers and the provider for creating incentives for teachers, such as a parking space since there is no parking available at the school. Teachers are also encouraged to continue their own studies with support from Title I funding.

Parents have also been educated on the transformation plan and participate in parent workshops on topics such as how to create a reading space at home and child abuse. Parents note that communication with the school has increased dramatically through the use of bulletins, phone calls from teachers, communication notebooks sent home with students daily, and the opportunity to visit teachers during their free periods.

Provider Support For Implementation

Puerto Rico Department of Education

PRDE requires each potential provider to submit a service proposal in response to an RFP. Each proposal must demonstrate that proposed strategies for turning around a school are based in research, and that instructional and coaching strategies have proven effective in other low-performing schools. References from districts and previous employers are required. The providers must also demonstrate fiscal solvency as well as have no prior issues managing federally funded projects.

The threshold for experience included demonstrating success with other federal programs, good evaluations of supplemental educational services, and specialized coaching experiences. Monitoring results of program implementation were evidenced by reports from the Office of Federal Affairs Monitoring Unit, from external evaluators as well as the U.S. Department of Education and were specific to the project.

Once a provider is approved, PRDE invites the provider to attend an open house where school principals, school planning committee members and representatives from the district can learn about each provider and rank order the providers that they feel best meet their school's needs. PRDE then matches each school with a provider, based on the school's selection. School leadership as well as PRDE indicated that in most cases schools received their top provider selection.

When SIG implementation begins, providers report to PRDE on specific elements/activities weekly as a way for the SEA to monitor the fidelity of the implementation according to the service plan. This plan outlines weekly activities to be conducted which are also divided in

phases for billing purposes. The activities require specific evidence to allow PRDE to determine fidelity to the provider's service plan. At the completion of the weekly activities the school principal must certify that activities have been completed before a provider is paid for services rendered in each phase.

This system also allows the provider and principal to submit a request to revise an activity or request a change to the implementation plan.

Ediciones Santillana, Inc. (Juan A. Sánchez Dávila (Cohort 1), Mariano Abril Intermedia (Cohort 2) & Carlos Conde Marín (Cohort 1) schools)

The provider began by placing a program coordinator and community liaison in each school and conducting a thorough needs assessment (through questionnaires and observations) in the spring of 2012 to begin full implementation in the 2012-2013 school year. The assessment identified three key concerns: 1) Unsupervised students were leaving the campus as a result of teacher absenteeism; 2) Instructional or leadership decisions were made without consulting available data; and 3) Parents were not engaged in the school community or learning process.

In addition to addressing the major areas of concern in the needs assessment, Ediciones Santillana, Inc. is supporting and motivating the school principal in PRDE's pilot teacher evaluation system that incorporates data on student growth; provided on-going, job-embedded professional development for staff; used data to inform and differentiate instruction; provided opportunities for family and community engagement; and supported increased learning time.

Additionally, there are monthly meetings between the district and school. The district supports the teacher planning process, which had not consistently occurred in the past. The district does observations of teachers and if there is a specific need identified by school staff, the district provides support.

Virtual Education Resources Network, Inc. (Eduardo Neumann Gandía (Cohort 2) & Rodulfo del Valle (Cohort 1) schools)

In each school the provider serves to provide/facilitate guidance in regards to the analysis of data and looking for proven practices that will help create activities/interventions aligned to the needs of the schools. The emphasis is to support the transformational plan prepared by the school with the assistance of the provider at the beginning of the implementation (capacity building and develop more the potential that exists in each of the schools).

The provider began studying the declining levels of academic achievement. This went beyond specific grade concerns but was a comprehensive examination of the history of academic achievement. The provider was able to conduct student level analysis to determine mastery of specific standards. The focus was involving all stakeholders in the analysis process so everyone understood what the data said when they were constructing the school's transformational plan. Each school has similar needs in terms of planning to understand standards/expectations, assessments and how to use outcomes to determine effective educational strategies. Technology integration is one of the top strategies necessary for each school.

In addition to addressing the major areas of concern in the needs assessments, the provider supports and motivates the principal in PRDE's pilot principal teacher evaluation system that incorporates data on student academic growth; and supports increased learning time. In interviews, the provider indicated that Eduardo Neumann school continues to struggle with teacher absenteeism and high numbers of teacher assistants rather than teachers in core subject areas.

The provider was proactive in engaging the districts as a part of their reform strategy to support SIG implementation. This strategy is to ensure that the districts make the lowest performing schools a priority as well as get each district to assist in sustaining the transformation effort.

Universidad de Puerto Rico (Carlos Escobar Lopez (Cohort 1) school)

The needs assessment conducted by the provider identified four key areas of concern: 1) Poor instruction as the result of lack of instructional preparation and the use of differentiated instruction; 2) Lack of engagement by parents and the community; 3) Low teacher attendance; and 4) Community violence.

The provider has replaced its school team four times over the course of implementation. Presently, the University provides a Program Coordinator to support implementation and Instructional Specialists that model classes and prepare materials and work with teachers on instructional reform. Additionally, the coaches are serving as substitutes when teachers are absent and also work directly with teachers to assist with planning.

The provider is also taking the students to the university to demonstrate how different the classes are from those at the school. This was to address the concern that students generally perceived high school completion to be enough to prepare them for entering the workforce. Students were able to observe how college students participate in classes (e.g. note taking and participating in class discussions), which is culturally different from the discipline of the students in the high school. The students became models of good conduct/behavior to other students in the school.

There is a great emphasis on empowering students to be involved in the academic process and that the provider is there to help the students build their academic confidence. In addition to addressing the major areas of concern in the needs assessment, the provider assisted the school in implementing a new teacher and principal evaluation system that incorporates data on student growth; using data to inform and differentiate instruction; providing opportunities for family and community engagement; and increased learning time.

As in most cases in Puerto Rico, district involvement in the transformation process was limited at the outset of SIG implementation. The provider has engaged the district to calibrate practices and ensure that PRDE instructional policies are implemented strongly and practices are aligned to support each other.

Fiscal

PRDE reserves five percent of the State's SIG allocation and uses its reservation for support staff to manage the oversight of the SIG program as well as to support the development of the online

monitoring tool. Additionally, these funds are used for professional development opportunities for district and school staff.

PRDE ensures that SIG funds are spent on allowable activities by reviewing supporting documentation submitted by the provider against the school's transformation plan. In order to ensure that materials such as books have been purchased for schools, PRDE established an agreement where each school provider acquires the materials aligned with the strategies in the transformation plan and the inventory is used to support these strategies. This procurement process does not address the systemic problem that schools face in getting instructional necessities in a timely manner and is not a sustainable practice that addresses the schools long-term needs.

Technical Assistance

Puerto Rico Department of Education

As both the SEA and LEA, PRDE has provided technical assistance to the schools through the matching process they have created to pair schools with external providers to implement their transformation plans and monitor the provision of services by those providers. PRDE has built a system for ensuring the providers' services are being executed according to their agreement with the schools and is directly linked to the invoicing of services provided. The next stage of development of the system is for PRDE to determine the quality and effectiveness of providers for future eligibility determinations.

PRDE's Office of School Improvement (OME) Director and staff, with support of FLICC and the Academic Affairs personnel, provide training to district staff and focuses on developing the skills of the districts to support the ongoing transformation process. PRDE also provides schools with training and support related to the data dashboard and how to make data-driven decision, as well as piloting the teacher and principal evaluation system, which are also addressed as a part of the weekly reports the school sends to PRDE. PRDE analyzes the information and where there are issues, reaches out to determine the problem (e.g., understanding of how to use the system) and resolve it. If multiple schools are having common issues, PRDE will bring those schools together for joint training.

As stated previously, PRDE acts as both the SEA and the LEA and the districts do not have the same role in providing technical assistance to schools as a typical LEA might have. However, PRDE is working with FLICC to create a district-level system of support for the schools as part of their efforts to sustain the SIG reforms. In interviews with the three schools visited the school staff consistently indicated they currently receive minimal support from the district. Both districts identified below indicated a need for more human resources; onsite workshops that are directed specifically to transformation schools; a budget for the district to provide training for the schools; and peer trainings where other successful principals can come talk to their peers about their experience in implementing the strategies with which others are experimenting.

San Juan I

In interviews district staff indicated they have monthly meetings with the schools' providers to follow up with implementation processes and talk about how the district can help them with

implementation. The district has provided capacity building workshops on improving instruction and invites the provider coaches to join them in the classroom visits and compare observations. The district described creating a calendar of visits to the schools and prioritizing the support to the SIG schools.

In interviews the district also described its role as providing oversight for the implementation of SIG and ensuring the teachers' participation in the reform initiatives. While it can try to enforce the requirements of SIG and PRDE's policies for planning and teacher attendance by referring a teacher to the legal division and following a formal discipline protocol, the district doesn't actually have the authority to dismiss non-compliant teachers; this authority resides with PRDE.

San Juan II

In interviews district staff indicated they have begun monthly meetings with the schools' providers to follow up with implementation processes and are providing direct assistance to the principals. The district has offered training on common planning according to subject area and followed up the trainings to ensure implementation according to the standards. The district examined student proficiency data to make recommendations to schools on which specific content areas needed to be addressed. For example, at Alejandro Tapia y Rivera school they noticed students weren't excelling in math so they engaged the music teachers to reinforce math concepts to illustrate how they exist in both content areas. The district has created partnerships with the University of Puerto Rico in Carolina and Scholastic to provide professional development on topics including English, math, and Perkins funding.

District staff also noted teachers' resistance to facilitator visits and/or planning according to the protocol, which has also resulted in referrals to the legal process for disciplinary action.

Monitoring

In its approved application the PRDE proposed annual onsite and desk monitoring, monthly Roundtable Committee meetings to coordinate SEA and Regional Staff monitoring activities, and contracted external evaluations of providers. In interviews, school and provider staff reported that the SEA is onsite at least once during the school year to monitor the implementation of SIG. Each school's implementation is evaluated each semester for fidelity of implementation and each school's provider and school principal must both report weekly to the PRDE, through the SEA's online monitoring tool, the activities that have occurred aligned to the school's transformation plan.

Data Collection

PRDE uses its online monitoring system to collect data on SIG achievement and leading indicators from LEAs and schools. While the system is comprehensive on the data it collects related to each school's performance, it is unclear if student level data is submitted to the SEA on a monthly or quarterly basis.

According to EDFacts records, PRDE has not submitted all required achievement and leading indicator data to the Department. PRDE has not submitted data on High School Graduation and

Postsecondary Enrollment Rates for the 2011-2012 and 2012-2013 school years. Additionally, all SIG program data for the 2012-2013 school year, as required by the Department, has not been submitted as of the date of the site visit.

PRDE uses the data it collects to inform its overall monitoring process for ensuring each school's provider is assisting in fully implementing the transformation model and for the purpose of coaching and empowering school leaders to make decisions based on each school's data.

TECHNICAL ASSISTANCE RECOMMENDATIONS

Issue: IMPLEMENTATION. Six SIG schools in PRDE's first cohort of SIG schools did not begin implementing until the second semester of the 2011-2012 school year. PRDE should review each school's remaining funds and determine whether to apply for a waiver to support the full implementation of the model for those schools during a fourth year.

Technical Assistance Strategies:

- Provide PRDE with the invitation to submit a waiver to allow for a fourth year of SIG implementation in Cohort 1 schools. (*Responsibility: ED*)
- Review each Cohort 1 school's available funds to determine the ability of each school to implement SIG for a fourth year and assist eligible schools in revising transformation plans to fully implement the transformation model for a fourth year. (*Responsibility: PRDE*)
- Submit a request to ED's Assistant Secretary for Elementary and Secondary Education to permit eligible Cohort 1 schools to implement for a fourth year. (*Responsibility: PRDE*)

Issue: IMPLEMENTATION. In working with ED's ESEA flexibility team, PRDE should review the ESEA flexibility turnaround principles and revise their approach to serving priority schools for the 2014-2015 school year. PRDE will not have the funds to ensure that each identified, non-SIG school can implement the transformation model. Further, PRDE cannot ensure that each school would have a qualified leader in place to support full implementation of a SIG model.

Technical Assistance Strategies:

- Provide PRDE with the policy chart outlining the turnaround principles and the transformation model requirements. (*Responsibility: ED*)
- Review PRDE's plan as outlined in its request for ESEA flexibility and determine the appropriate next steps. (*Responsibility: PRDE*)

POLICY RECOMMENDATIONS

Recommendation: Four principals have been removed from SIG schools after the first semester of implementation because of evaluations. In one instance, the school was without a principal during the onsite monitoring by the ED. Principals in SIG schools should not be removed from a

currently implementing school after only one semester on the job based on their initial evaluation but should receive additional support and coaching through the first year of implementation.

Recommendation: Up to one-third of the instructional staff at each SIG school visited could be removed from the school at the end of the year because the teachers are not in tenured positions. PRDE should revise its system of transitory teacher placement to ensure that teachers in SIG schools who are not tenured remain in the schools through implementation unless the teacher’s evaluation demonstrates a lack of instructional improvement and student growth.

Recommendation: While PRDE has implemented a model provider oversight system, PRDE should develop a comprehensive plan to use data from that system to determine the effectiveness of a provider for the purposes of advising implementation and making decisions related to future contract work with providers. In one instance, the provider team had changed four times during the three years of SIG implementation.

Recommendation: PRDE made an agreement with providers to procure physical resources as a way of circumventing state and local procurement process inefficiencies. This has placed a burden on providers and does not restructure PRDE’s system to promote sustainable and efficient business practices. PRDE should improve internal management of services for procurement processes for schools.

MONITORING FINDINGS

Summary of Monitoring Indicators

Critical Element	Requirement	Status	Page
1. Application Process	The SEA ensures that its application process was carried out consistent with the final requirements of the SIG program. <i>[Sections I and II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]</i>	Finding	14
2. Implementation	The SEA ensures that the SIG intervention models are being implemented consistent with the final requirements of the SIG program. <i>[Sections I and II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]</i>	Finding	15
3. Fiscal	The SEA ensures LEAs and schools are using funds consistent with the final requirements of the SIG program. <i>[Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and</i>	Finding	16

	<i>Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010)) ; §1114 of the ESEA; and Office of Management and Budget (OMB) Circular A-87]</i>		
4. Technical Assistance	The SEA ensures that technical assistance is provided to its LEAs consistent with the final requirements of the SIG program. <i>[Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]</i>	N/A	
5. Monitoring	The SEA ensures that monitoring of LEAs and schools is being conducted consistent with the final requirements of the SIG program. <i>[Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]</i>	N/A	
6. Data Collection	The SEA ensures that data are being collected consistent with the final requirements of the SIG program. <i>[Sections II and III of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]</i>	Finding	16

Monitoring Area: School Improvement Grant

Critical Element 1: The SEA ensures that its application process was carried out consistent with the final requirements of the SIG program.

Finding 1: PRDE awarded SIG funds to schools in its first and second cohort that did not have the capacity to fully implement the transformation model. In the first year of PRDE’s cohort one SIG schools’ implementation, PRDE failed to have principals in place at the start of the school year to begin implementation of the transformation model as required by the SIG program for six schools. Additionally, in the second cohort of SIG schools, for the first semester of implementation, each school’s assigned provider conducted a thorough needs analysis. Each school then began fully implementing transformation strategies during the second semester of the school year.

Citation: Section II.B.2.(b)(iii) of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010)), states that an SEA must ensure the LEA

has the capacity to implement the selected intervention fully and effectively in each Tier I and Tier II school identified in its application.

Further action required: PRDE must submit evidence that it has conducted a review to ensure that districts awarded FY 2013 continuation funds have the capacity to implement the chosen intervention(s) fully and effectively. PRDE must submit the evidence to the ED within 35 business days of receiving a copy of this report. For any school that PRDE has determined lacks the capacity to implement the intervention(s) fully and effectively, PRDE must submit a plan for supporting the district(s) and school(s) in overcoming the lack of capacity during the remaining period of the grant. In its FY 2014 SIG application, PRDE must include a plan for ensuring that schools awarded have demonstrated the capacity to implement required reforms.

Critical Element 2: The SEA ensures that the SIG intervention models are being implemented consistent with the final requirements of the SIG program.

Finding 2: PRDE has not ensured that each SIG transformation school is fully implementing a system of rewards. This finding remains unresolved from the March 2012 site visit.

Citation: Section I.A.2.(d)(1)(i)(C) of the SIG final requirements states that an LEA must identify and reward school leaders, teachers, and other staff who, in implementing this model, have increased student achievement and high school graduation rates and identify and remove those who, after ample opportunities have been provided for them to improve their professional practice, have not done so.

Further action required: PRDE must complete the action steps in its approved High Quality Plan no later than October 31, 2014.

Finding 3: PRDE has not ensured that each SIG transformation school is fully implementing increased learning time consistent with the final requirements of the SIG program. This finding remains unresolved from the March 2012 site visit.

Citation: Section I.A.2 (d) (3) (A) of the final requirements stipulates, as part of the transformation model, that an LEA must “establish schedules and implement strategies that provide increased learning time.” Section I.A.3 of the final requirements defines “increased learning time” as “using a longer school day, week, or year schedule to significantly increase the total number of school hours to include additional time for: (a) instruction in core academic subjects including English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, arts, history, and geography; (b) instruction in other subjects and enrichment activities that contribute to a well-rounded education, including, for example, physical education, service learning, and experiential and work-based learning opportunities that are provided by partnering, as appropriate, with other organizations; and, (c) teachers to collaborate, plan, and engage in professional development within and across grades and subjects.”(75 FR 66363 (October 28, 2010)).

Further action required: PRDE must complete the action steps in its approved High Quality Plan no later than September 30, 2014.

Critical Element 3: The SEA ensures LEAs and schools are using funds consistent with the final requirements of the SIG program.

Finding 4: PRDE used SIG funds to purchase equipment such as photocopiers and tables for implementing schools.

Citation: Section 9304(a) of the ESEA requires that the SEA ensure that programs authorized under the ESEA are administered in accordance with all applicable statutes, regulations, program plans, and applications. Office of Management and Budget (OMB) Circular A-87 (2 CFR 225) requires that in order for costs to be allowable under Federal awards, they must be reasonable, necessary, and allocable.

Further action required: The PRDE must review the expenditures for each SIG school and reimburse the SIG program for the purchase of equipment and other unreasonable purchases at each school using programmatic funds. The PRDE must provide evidence that it has completed a comprehensive review of expenditures and reimbursed the SIG program for unallowable purchases no later than 60 business days after the receipt of this report. PRDE must strengthen their internal controls to ensure that these unallowable expenditures do not occur again in the future. PRDE should provide technical assistance to schools and providers on allowable costs.

Critical Element 6: The SEA ensures that monitoring of LEAs and schools is being conducted consistent with the final requirements of the SIG program.

Finding 5: PRDE has not submitted data on High School Graduation and Postsecondary Enrollment Rates for the 2011-2012 and 2012-2013 school years. Additionally, all SIG program data for the 2012-2013 school year, as required by the ED, has not been submitted as of the date of the site visit.

Citation: Section III.A.4 of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010)), states that an SEA must report on the SIG leading and achievement metrics annually, with the first report providing baseline data and each subsequent report providing data based on the prior year of implementation of one of the four interventions. The SEA must provide such annual reports for each year for which the SEA allocates SIG funds under section 1003(g) of the ESEA.

Further action required: PRDE must submit teacher attendance data to ED Facts within 30 business days of receipt of this report. PRDE must submit evidence that it has submitted the missing data to the ED within 35 business days of receiving a copy of this report.