

Part B State Annual Performance Report (APR) for FFY 2006**Overview of the Annual Performance Report Development:**

As preparation of the FFY 2005 APR was a whirlwind learning experience for the Puerto Rico Department of Education (PRDE) Office of Special Education (SAEE) staff, preparation of the FFY 2006 APR submission has truly been a strengthening and foundational year long learning experience. The PRDE SAEE leadership had been in position for only four months upon the FFY 2005 APR submission. With a full year to build the foundation, grow to understand the Annual Performance Report process, work closely and develop relationships with OSEP staff as well as SERRC and DAC technical assistance providers, PRDE SAEE is very proud of what it has been able to accomplish for the FFY 2006 APR submission.

Areas of improvement during FFY 2006 that PRDE SAEE is particularly proud of include the progress it has made with state complaints (Indicator 16), evaluations (Indicator 11), resolution sessions (Indicator 18), and assessments (Indicator 3). It is also especially proud of its improved measurement approaches to Indicators 1 and 2. Areas in which PRDE SAEE expects to focus a lot of attention and make major fundamental progress over the next year include its approach to general supervision (Indicator 15) and secondary transition (Indicators 13 and 14).

PRDE SAEE is proud of the past year's progress, and even more proud of the progress it already sees on the horizon for FFY 2007. We realize a lot of work remains, but as the PRDE SAEE leadership has demonstrated to OSEP throughout our collaboration over the past year, this is a strong and unified team that is up for the challenge.

The PRDE SAEE looks forward to working collaboratively with OSEP in order to ensure compliance and work towards improving the educational experience for our students.

Part B State Annual Performance Report (APR) for FFY 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: FAPE in the LRE

Indicator 1: Percent of youth with IEPs graduating from high school with a regular diploma compared to percent of all youth in the State graduating with a regular diploma.

(20 U.S.C. 1416 (a)(3)(A))

Measurement: Measurement for youth with IEPs should be the same measurement as for all youth. Explain calculation.

- All Youth: The total number of students graduating from the 12th grade (including IEP students) divided by the overall 12th grade enrollment for that year.
- Youth with IEP: The total number of students with an IEP graduating from the 12th grade divided by the overall 12th grade enrollment of students with an IEP for that year.

Overview of Issue / Description of System or Process:

The requirement for this indicator has changed this year and now allows the SEA the option to report only the percent of youth with IEPs graduating from high school with a regular diploma without making a comparison to the percent of all youth graduating with a from high school. In accordance with these new changes, Puerto Rico is revising its baseline so that data for Indicator 2 is measured consistently.

PRDE is using the Section 618 Data Report, Table 4 Report of Children with Disabilities Exiting Special Education, as the data source for this indicator. Technical Assistance was provided by DAC and SERCC in helping PRDE understand its data sources and calculations. Puerto Rico is using the federal definition for graduation rate. This is calculated using data from the 'All Disabilities' page (tab 13 of Table 4). Data from row B ('graduated with regular high school diploma') constitutes the numerator with the total of summing the data from rows B ('graduated with regular high school diploma'), C ('received a certificate'), D ('reached a maximum age'), E ('died'), and G ('dropped out') constituting the denominator. Puerto Rico herein is reporting its data under this approach to Indicator 1 for FFY 2004, FFY 2005, and FFY 2006.

The technical assistance and clarifications provided by OSEP, SERRC, and DAC allowed PRDE to have a better understanding of what is required in this indicator. PRDE herein establishes and reports its updated baseline for FFY 2004, to appropriately set its measureable and rigorous targets, its actual target data for FFY 2005 and FFY 2006, and its improvement activities.

Baseline Data for FFY 2004 (2004-2005) and Actual Target Data for FFY 2005 (2005-2006) and FFY 2006 (2006-2007):

Baseline Data for FFY 2004:

B. Graduated with regular high school	C. Received a certificate	D. Reached Maximum Age	E. Died	G. Dropped out	(B + C + D + E + G)
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diploma					
1024	302	123	24	1309	2782

Baseline Measurement for FFY 2004:

B. Graduated with regular high school diploma	Divided by (B + C + D + E + G)	FFY 2004 Baseline Data
1024	0.3681	<u>36.81%</u>

Actual Data for FFY 2005:

B. Graduated with regular high school diploma	C. Received a certificate	D. Reached Maximum Age	E. Died	G. Dropped out	(B + C + D + E + G)
1261	253	78	27	668	2287

Actual Measurement for FFY 2005:

B. Graduated with regular high school diploma	Divided by (B + C + D + E + G)	FFY 2005 Actual Target Data
1261	0.5514	<u>55.14%</u>

Actual Data for FFY 2006:

B. Graduated with regular high school diploma	C. Received a certificate	D. Reached Maximum Age	E. Died	G. Dropped out	(B + C + D + E + G)
1260	157	47	14	455	1933

Actual Measurement for FFY 2006:

B. Graduated with regular high school diploma	Divided by (B + C + D + E + G)	FFY 2006 Actual Target Data
1260	0.6518365	<u>65.18%</u>

Discussion of Data:

Data reviews demonstrated that a total of 1024 students graduated from high school out of the 2782 students who exited the 2004-05 school year. Graduation rate based on 618 data for the 2004-05 school year was calculated using the data from graduation tab 13 all disabilities row B divided by all exits from school tab 13 rows B,C,D,E and G. PRDE used this data to set a new baseline. After recalculations our graduation rate for 2004-2005 was 36.81%.

PRDE reported in Table 4 for 2005-06 school year a total of 1261 graduating students out of the 2287 students who exited that year. This represented a 55.14% graduation rate. Comparisons between percents showed a significant improvement between 2004-05 and 2005-06 school years. The progress demonstrated can be due to better student placement policies and availability. The regular classroom with resource room placement for Special Education services is the most frequently used placement option. Every year we have seen continuous opportunities provided so that the students can attend regular classes with their corresponding accommodations. This placement is more likely and accessible to the special education students. Once the student is enrolled in regular classes, his participation in his

community based school is broader and provided with the proper curriculum adaptations and accommodations special education students have the opportunity to compete for his/her regular education diploma. For regular students PRDE has established a minimum of 21 credits in academic and not academic areas to obtain a regular diploma and this also applies to those Special Education students enrolled in regular classrooms. Policy revisions have allowed for special education students to participate in more academic and vocational options. Policy revisions have also allowed special education students to earn credits for their attendance and performance in resource rooms. Students with learning disabilities, speech and language problems, deaf, vision impairments and diagnosed with autism spectrum are students who enjoy the most from the inclusion and some other ways of regular class integration. More and more students benefit from these placements that allow having most of the population enrolled affording them the opportunity to compete with significant positive results. PRDE also did training on the exiting definitions and made clarifications between graduation, received a certificate, and reached maximum age. These clarifications aided PRDE personnel in correctly identifying graduating students instead of classifying them as received a certificate or reached maximum age.

The data reported herein for the 2006-2007 school year comes from PRDE’s revised 618 Table 4, which is being submitted to Westat and OSEP simultaneously this date, April 14, 2008. For the 2006-2007 school year a total of 1260 Special Education students graduated from high school out of the 1933 students who were reported as exiting in the 2006-2007 school year. Graduation rate based on 618 data for the 2006-07 school year is 65.18% for special education students. Because of concerns with its initial 618 exiting table data for 2006-2007, PRDE conducted a thorough data validation review. The SAEE is in the process of developing a state wide data management system (SeasWeb). The data for the 2006-07 exiting report was taken from the data base collected to populate the information system. Due to factors related to the transition between the information systems, PRDE SAEE had concerns with the initial data. PRDE SAEE’s thorough data validation review included meetings with general and district supervisors as well as Special Education Service Center and School District staff to review, validate, and confirm the exiting data. The validation and review of the data leads us to believe that the updated data is valid and reliable.

FFY	Measurable and Rigorous Target
2004 (2004-2005)	A new baseline has been established: 36.81%
2005 (2005-2006)	Actual Target Data: 55.14%
2006 (2006-2007)	Actual Target Data: 65.18%
2007 (2007-2008)	Maintain FFY 2006 Data
2008 (2008-2009)	65.5%
2009	66%

<i>(2009-2010)</i>	
2010 <i>(2010-2011)</i>	66.5%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

Activities	Progress	Slippage
1. Continue to collect and validate graduation data for IEP students.	PRDE completed the phase of collecting student information (perfiles) and has completed data entry to the new information data base. After a review of the initial data showed that the data required for the 618 exiting reports needed to be reviewed, PRDE SAAE reviewed and validated its data for this indicator. PRDE SAAE's thorough data validation review included meetings with general and district supervisors as well as Special Education Service Center and School District staff to review, validate, and confirm the exiting data.	
2. Align special education program data collection to track information consistent with the one used the PRDE Office of Academic Affairs for NCLB.	PRDE has demonstrated significant progress in data entry in the SIS system. It should be noted, however, that with the revision of measurement for this indicator, a comparison between special education graduation rate and overall graduation is no longer required. As such, this activity is no longer applicable as an improvement activity for this indicator.	The Department is in the process of completing data entry and data validation.
3. Set measureable and rigorous targets using valid data and submit in the February 1, 2008 plan.	With DAC's and SERRC's technical assistance, PRDE has reviewed its data and has set a new baseline and measureable and rigorous targets.	
4. Increase special education support, placement options, streamlined procedures, transition planning available to IEP students in high school.	PRDE is continuing these efforts.	
5. Increase special education support, professional development, technical assistance available to high school	PRDE is continuing these efforts.	

teachers and other personnel.		
6. Include graduation rates in the monitoring process.	As we are working to re-envision the PRDE SAAE Monitoring Unit (See Indicator 15 discussion), this activity will be re-evaluated and taken into consideration.	

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for (2006-2007)

Having a new baseline PRDE is reporting new improvement activities. PRDE reserves the right to adjust its baseline and targets as necessary to ensure meaningful performance reports.

Activities	Timelines	Resources
1. Maintaining special education support, placement options, streamlined procedures, transition planning available to IEP students in high schools as a means of working to maintain a high graduation rate.	On-going	Special Education General and District Supervisors
2. Maintaining special education support and professional development, technical assistance available to high school teachers and other personnel.	On-going	Special Education General and District Supervisors
3. Continue to monitor graduation rates and foster retention in schools.	On-going	Special Education General and District Supervisors
4. Evaluate Table 4 data collection methods and participate in activities to help ensure reliable data collection; continue data validation activities.	March 2008, continuously	Special Education General Supervisors (Central Level)

Part B State Annual Performance Report (APR) for FFY 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: FAPE in the LRE

Indicator 2: Percent of youth with IEPs dropping out of high school compared to the percent of all youth in the State dropping out of high school.

(20 U.S.C. 1416 (a)(3)(A))

Measurement: Measurement for youth with IEPs should be the same measurement as for all youth.

Overview of Issue / Description of System or Process:

The requirement for this indicator has changed this year and now allows the SEA the option to report only the percent of youth with IEPs dropping out of high school without making a comparison to the percent of all youth dropping out of high school. In accordance with these new changes, Puerto Rico is revising its baseline so that the data for Indicator 2 is measured consistently.

PRDE is using the Section 618 Data Report, Table 4 Report of Children with Disabilities Exiting Special Education, as the data source for this indicator. Technical Assistance was provided by DAC and SERCC in helping PRDE understand its data sources and calculations. Puerto Rico is using the federal definition for drop-out rate. This is calculated using data from the 'All Disabilities' page (tab 13 of Table 4). Data from row B ('graduated with regular high school diploma'), C ('received a certificate'), D ('reached a maximum age'), E ('died'), and G ('dropped out') constituting the numerator with the total of summing the data from rows B, C, D, E, and G constituting the denominator. Puerto Rico herein is reporting its data under this approach to Indicator 2 for FFY 2004, FFY 2005, and FFY 2006.

The technical assistance and clarifications provided by OSEP, SERRC, and DAC allowed PRDE to have a better understanding of what is required in this indicator. PRDE herein establishes and reports its updated baseline for FFY 2004, to appropriately set its measureable and rigorous targets, its actual target data for FFY 2005 and FFY 2006, and its improvement activities.

Baseline Data for FFY 2004 (2004-2005) and Actual Target Data for FFY 2005 (2005-2006) and FFY 2006 (2006-2007):

Baseline Data for FFY 2004:

B. Graduated with regular high school diploma	C. Received a certificate	D. Reached Maximum Age	E. Died	G. Dropped out	(B + C + D + E + G)
1024	302	123	24	1309	2782

Baseline Measurement for FFY 2004:

G. Dropped Out	Divided by (B + C + D + E + G)	FFY 2004 Baseline Data
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1309	0.4705	<u>47.05%</u>
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Actual Data for FFY 2005:

B. Graduated with regular high school diploma	C. Received a certificate	D. Reached Maximum Age	E. Died	G. Dropped out	(B + C + D + E + G)
1261	253	78	27	668	2287

Actual Measurement for FFY 2005:

G. Dropped Out	Divided by (B + C + D + E + G)	FFY 2005 Actual Target Data
668	0.2921	<u>29.21%</u>

Actual Data for FFY 2006:

B. Graduated with regular high school diploma	C. Received a certificate	D. Reached Maximum Age	E. Died	G. Dropped out	(B + C + D + E + G)
1260	157	47	14	455	1933

Actual Measurement for FFY 2006:

G. Dropped Out	Divided by (B + C + D + E + G)	FFY 2006 Actual Target Data
455	0.2353854	<u>23.54%</u>

Discussion of Data:

The requirement for this indicator has changed and it allows the SEA the opportunity to report only the percent of youth with IEP'S dropping out from high school. PRDE collects drop out data for students with IEPs as per Section 618 data reporting requirements. The data is disaggregated by disability and age. PRDE defines "dropping out" for students with IEPs as students who leave school prior to completing the academic program, which is consistent with the definition used in Section 618 data report.

PRDE used Section 618 Data Report, Table 4, as the data source for this indicator. Technical Assistance was provided by DAC and SERCC in helping PRDE understand its data sources and calculations. The data was revised and a new baseline was established for PRDE. Data reviews demonstrated that a total of 1309 students dropped out from high school out of the 2782 students who exited the 2004-05 school year. Dropout rate based on 618 data for the 2004-05 school year was calculated using the data from the drop out tab 13 all disabilities row G divided by all exits from school tab 13 rows B, C, D, E and G. PRDE used this data to set a new baseline. After recalculations our dropout rate for 2004-2005 was 47.05%.

PRDE reported in Table 4 for 2005-06 school year a total of 668 students dropped out of the 2287 students who exited that year. This represented a 29.21% drop out rate. Comparisons between percents showed a significant improvement between 2004-05 and 2005-06 school years. The progress demonstrated can be due to the same reasons we saw an increase in graduation rates such as: better student placement policies and availability. PRDE did training on the definitions of drop outs and

provided technical assistance to schools that were reporting drop outs. Social workers and other staff have been trained on providing options for students who are in risk of dropping out of schools.

The data reported herein for the 2006-2007 school year comes from PRDE’s revised 618 Table 4, which is being submitted to Westat and OSEP simultaneously this date, April 14, 2008. For the 2006-2007 school year a total of 455 Special Education students were reported as drop outs from high school out of the 1966 students who were reported as exiting in the 2006-2007 school year. Drop-out rate based on 618 data for the 2006-07 school year is 23.54% for special education students. Because of concerns with its initial 618 exiting table data for 2006-2007, PRDE conducted a thorough data validation review. The SAEE is in the process of developing a state wide data management system (SeasWeb). The data for the 2006-07 exiting report was taken from the data base collected to populate the information system. Due to factors related to the transition between the information systems, PRDE SAEE had concerns with the initial data. PRDE SAEE’s thorough data validation review included meetings with general and district supervisors as well as Special Education Service Center and School District staff to review, validate, and confirm the exiting data. The validation and review of the data leads us to believe that the updated data is valid and reliable

The technical assistance and clarifications provided by OSEP allowed PRDE to have a better understanding of what is required in this indicator. PRDE has established a new baseline that will allow us the opportunity to reset new targets and set new improvement activities.

FFY	Measurable and Rigorous Target
2004 (2004-2005)	A new baseline has been established: 47.05%
2005 (2005-2006)	Actual Target Data: 29.21%
2006 (2006-2007)	Actual Target Data: 23.54%
2007 (2007-2008)	Maintain FFY 2006 Data
2008 (2008-2009)	23%
2009 (2009-2010)	22.5%
2010 (2010-2011)	22%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

Activities	Progress	Slippage
1. Develop and implement a consistent dropout rate for both regular and IEP students.	As discussed above, with the technical assistance of DAC and SERRC, PRDE has decided to use the federal definition.	
2. Increase special education support available for high school students Align special education program data.	PRDE is continuing these activities.	
3. Increase special education support for teachers and other high school personnel.	PRDE is continuing these activities.	
4. Increase coordination between Special Education and Academic Affairs Offices to ensure accuracy and uniformity of data.	PRDE is continuing these activities.	
5. Develop and implement a system to track dropout rates of IEP students aligned with NCLB approved rates.	PRDE is continuing these activities.	
6. Include drop out information in targeted monitoring system.	As we are working to re-envision the PRDE SAAE Monitoring Unit (See Indicator 15 discussion), this activity will be re-evaluated and taken into consideration.	
7. Continue to implement efforts to facilitate transition services, student participation in decision making process, placement options, inclusion of key stakeholders, intra and interagency.	Technical assistance will be received from DAC and SERRC in order to re-envision transition procedures. Models of transition from other SEAs are being revised. Interagency agreements between PRDE and Rehabilitation Services are in place.	

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for (2006-2007)

Having a new baseline PRDE is reporting new improvement activities. PRDE reserves the right to adjust its baseline and targets as necessary to ensure meaningful performance reports.

Activities	Timelines	Resources
1. Increase special education support available to high school students.	On-going	Special Education General and District Supervisors
2. Increase special education support for teachers and other high school personnel.	On-going	Special Education General and District Supervisors
3. Target in and provide supports to districts that are reporting higher numbers of students dropping out of high schools.	March 2008 – May 2008	Special Education General and District Supervisors
4. Continue to collect and validate drop out data for IEP students.	On-going	Data Information Unit

Part B State Annual Performance Report (APR) for FFY 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: FAPE in the LRE

Indicator 3: Participation and performance of children with disabilities on statewide assessments:

- A. Percent of districts that have a disability subgroup that meets the State's minimum "n" size meeting the State's AYP objectives for progress for disability subgroup. **Puerto Rico is a unitary system, thus part A is not applicable to PRDE.**
- B. Participation rate for children with IEPs in a regular assessment with no accommodations; regular assessment with accommodations; alternate assessment against grade level standards; alternate assessment against alternate achievement standards.
- C. Proficiency rate for children with IEPs against grade level standards and alternate achievement standards.

(20 U.S.C. 1416 (a)(3)(A))

Measurement:

- A. Percent = $[(\# \text{ of districts meeting the State's AYP objectives for progress for the disability subgroup (children with IEPs)}) \div (\text{total } \# \text{ of districts that have a disability subgroup that meets the State's minimum "n" size in the State})] \times 100$. **Puerto Rico is a unitary system, thus part A is not applicable to PRDE.**
- B. Participation rate =
 - a. # of children with IEPs in assessed grades;
 - b. # of children with IEPs in regular assessment with no accommodations (percent = $[(b) \div (a)] \times 100$);
 - c. # of children with IEPs in regular assessment with accommodations (percent = $[(c) \div (a)] \times 100$);
 - d. # of children with IEPs in alternate assessment against grade level achievement standards (percent = $[(d) \div (a)] \times 100$); and
 - e. # of children with IEPs in alternate assessment against alternate achievement standards (percent = $[(e) \div (a)] \times 100$).

Account for any children included in a but not included in b, c, d, or e above.

Overall Percent = $[(b + c + d + e) \div (a)]$.

- C. Proficiency rate =
 - a. # of children with IEPs in assessed grades;
 - b. # of children with IEPs in assessed grades who are proficient or above as measured by the regular assessment with no accommodations (percent = $[(b) \div (a)] \times 100$);
 - c. # of children with IEPs in assessed grades who are proficient or above as measured by the regular assessment with accommodations (percent = $[(c) \div (a)] \times 100$);
 - d. # of children with IEPs in assessed grades who are proficient or above as measured by the alternate assessment against grade level achievement standards (percent = $[(d) \div (a)] \times 100$); and
 - e. # of children with IEPs in assessed grades who are proficient or above as measured against alternate achievement standards (percent = $[(e) \div (a)] \times 100$).

Account for any children included in a but not included in b, c, d, or e above.
 Overall Percent = $[(b + c + d + e) \text{ divided by } (a)]$.

In OSEP’s Analysis of PRDE’s Indicator 3 submission, OSEP asked PRDE to recalculate the baseline data for this. As such, PRDE is submitting this indicator in the SPP format.

Overview of Issue / Description of System or Process:

PRDE administered its island wide criterion referenced assessment for the 2006-07 school year. The tests are known as the Pruebas Puertorriqueñas de Aprovechamiento Academico (PPAA) and the Pruebas Puertorriqueñas de Evaluación Alternativa (PPEA). The PPEA is the AA-AAS administered to students with significant cognitive disabilities.

The state assessment system ensures the participation of regular and IEP students, grades 3-8 and 11 in Spanish, Math, English as a Second Language and Science in grades 4,8 and 11. Students with IEPs may participate in the PPAA with or without accommodations or in the PPEA based on what is appropriate pursuant to the child's IEP. Training was provided island wide on the use of accommodations for students with disabilities.

After participating in the technical assistance sessions provided by OSEP, PRDE has a better understanding of the data requirements for Indicator 3. Regular and Special Education personnel have come together and are working collaboratively with the Evaluation Unit. Personnel have been assigned to the Evaluation Unit who are responsible for the assessment data files management. PRDE went through a process of data mining for the past three years. We have revised and updated the assessment data files for 2004-05, 2005-06 and 2006-07. The data was revised so as to more readily render the data based on the measurement table for Indicator 3. Charts of this data and measurements are included below.

Baseline / Actual Target Data for FFY 2004, FFY 2005, FFY 2006:

Data and measurements for FFY 2004, FFY 2005, and FFY 2006 for both Indicator 3B, Participation, and Indicator 3C, Proficiency Rates, are set out below.

FFY 2004

Actual Target Data and Measurement for Part B, Participation, for FFY 2004:

Data Year and Examination	a. # of children with IEPs in grades assessed	b. # of children with IEPs in regular assessment (RA) with no accomm.	c. # of children with IEPs in regular assessment (RA) with accomm.	d. # of children with IEPs in alternate assessment (AA) against grade level standards (GLS)	e. # of children with IEPs in alternate assessment (AA) against alternate achievement standards (AAS)	Measurement [[$(b + c + d + e) / a$] x 100]
2004-2005, Spanish Participation	48,789	15,914	25,622	0	6,159	<u>97.76%</u>
2004-2005, Math Participation	48,789	15,840	25,692	0	6,132	<u>97.69%</u>

Actual Target Data and Measurement for Part C, Proficiency, for FFY 2004:

Data Year and Examination	a. # of children with IEPs in grades assessed	b. # of children with IEPs in grades assessed who are proficient or above as measured by the RA with no accomm.	c. # of children with IEPs in grades assessed who are proficient or above as measured by the RA with accomm.	d. # of children with IEPs in grades assessed who are proficient or above as measured by the AA against GLS	e. # of children with IEPs in grades assessed who are proficient or above as measured by the AA against AAS	Measurement [[(b + c + d + e) / a] x 100]
2004-2005, Spanish Proficiency	48,789	5,800	9,499	0	4,128	<u>39.82%</u>
2004-2005, Math Proficiency	48,789	15,840	25,692	0	3,040	<u>46.32%</u>

FFY 2005

Actual Target Data and Measurement for Part B, Participation, for FFY 2005:

Data Year and Examination	a. # of children with IEPs in grades assessed	b. # of children with IEPs in RA with no accomm.	c. # of children with IEPs in RA with accomm.	d. # of children with IEPs in AA against GLS	e. # of children with IEPs in AA against AAS	Measurement [[(b + c + d + e) / a] x 100]
2005-2006, Spanish Participation	48,547	18,324	27,351	0	2,257	<u>98.73%</u>
2005-2006, Math Participation	48,547	18,288	27,248	0	2,257	<u>98.44%</u>

Actual Target Data and Measurement for Part C, Proficiency, for FFY 2005:

Data Year and Examination	a. # of children with IEPs in grades assessed	b. # of children with IEPs in grades assessed who are proficient or above as measured by the RA with no accomm.	c. # of children with IEPs in grades assessed who are proficient or above as measured by the RA with accomm.	d. # of children with IEPs in grades assessed who are proficient or above as measured by the AA against GLS	e. # of children with IEPs in grades assessed who are proficient or above as measured by the AA against AAS	Measurement [[(b + c + d + e) / a] x 100]
2005-2006, Spanish Proficiency	48,547	5,065	7,284	0	664	<u>26.80%</u>

2005-2006, Math Proficiency	48,547	6,548	9,856	0	611	<u>35.05%</u>
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FFY 2006

Actual Target Data and Measurement for Part B, Participation, for FFY 2006:

Data Year and Examination	a. # of children with IEPs in grades assessed	b. # of children with IEPs in RA with no accomm.	c. # of children with IEPs in RA with accomm.	d. # of children with IEPs in AA against GLS	e. # of children with IEPs in AA against AAS	Measurement [[(b + c + d + e) / a] x 100]
2006-2007, Spanish Participation	53,805	15,398	34,088	0	1,907	<u>95.52%</u>
2006-2007, Math Participation	53,805	15,671	34,611	0	1,902	<u>96.99%</u>

Actual Target Data and Measurement for Part C, Proficiency, for FFY 2006:

Data Year and Examination	a. # of children with IEPs in grades assessed	b. # of children with IEPs in grades assessed who are proficient or above as measured by the RA with no accomm.	c. # of children with IEPs in grades assessed who are proficient or above as measured by the RA with accomm.	d. # of children with IEPs in grades assessed who are proficient or above as measured by the AA against GLS	e. # of children with IEPs in grades assessed who are proficient or above as measured by the AA against AAS	Measurement [[(b + c + d + e) / a] x 100]
2006-2007, Spanish Proficiency	53,805	4,591	10,814	0	661	<u>29.86%</u>
2006-2007, Math Proficiency	53,805	5,859	13,824	0	666	<u>37.82%</u>

Discussion of Baseline / Actual Data for FFY 2004, FFY 2005, FFY 2006:

PRDE resets its baseline based on the results of this data review. PRDE’s baseline is being set based on the 2005-06 data. PRDE considers FFY 2005’s data to be a better reflection of participation and performance over the FFY 200 data. The 2004-2005 academic year was the last year PRDE administered the *Metas e Indicadores* alternate assessment instrument before transitioning into the revised *Pruebas Puertorriqueñas de Evaluación Alternativa* in 2005-2006. The *Metas and Indicadores Assessment Instrument* for students with significant cognitive disabilities and criteria for administration did not meet federal requirements. We therefore understand that the 2004-05 data did not properly reflect actual student performance and proficiency.

The data for the FFY 2006 assessments demonstrate an increase in proficiency for both Spanish and Math. The participation rate decreased slightly in both Spanish and Math; however, it is important to note the significant overall increase in number children with IEPs in grades assessed between these two years. Although the participation rates decreased slightly (3.21% for Spanish, and 1.45% in Math), the total number of students with IEPs participating increased by more than 3,000 students island-wide.

A summary of the participation and proficiency rates for Spanish and Math for FFY 2005 and FFY 2006 is listed in the table below. Commentary about the changes from FFY 2005 to FFY 2006 is included in the table as well.

Subject/Participation/Proficiency	2005-06	2006-07	Commentary
PARTICIPATION: Spanish	98.73%	95.52%	Participation decreased by 3.21%
PROFICIENCY: Spanish	26.80%	29.86%	Proficiency increased by 3.06% PRDE surpassed the .2% increase set for the 2006 target, thus meeting its FFY 2006 target.
PARTICIPATION: Math	98.44%	96.99%	Participation decreased by 1.45%
PROFICIENCY: Math	35.05%	37.82%	Proficiency increased by 2.77% PRDE surpassed the .2% increase set for the 2006 target, thus meeting its FFY 2006 target.

Using the FFY 2005 data as the baseline, PRDE sets out its measureable and rigorous targets:

FFY	Measurable and Rigorous Target
<i>2005 (2005-2006)</i>	<p><i>A new baseline has been established:</i></p> <p><u>Indicator 3B</u>: Participation rate for children with IEPs in a regular assessment with no accommodations; regular assessment with accommodations; alternate assessment against grade level standards; alternate assessments against alternate achievement standards:</p> <p style="text-align: center;"><u>Spanish</u>: 98.73%</p> <p style="text-align: center;"><u>Math</u>: 98.44%</p> <p><u>Indicator 3C</u>: Proficiency rate for children with IEPs against grade level standards and alternate achievement standards:</p>

	<p><u>Spanish</u>: 26.80%</p> <p><u>Math</u>: 35.05%</p>
<p><i>2006</i> <i>(2006-2007)</i></p>	<p><u>INDICATOR 3B TARGET PREV EST'D</u>: Increase the participation rate for children with IEPs in a regular assessment with no accommodations; regular assessment with accommodations; alternate assessment against grade level standards; alternate assessments against alternate achievement standards by: .2%</p> <p>TARGET Missed. ACTUAL DATA:</p> <p><u>Spanish</u>: 95.52% (Decreased 3.21%)</p> <p><u>Math</u>: 96.99% (Decreased 1.45%)</p> <p><u>INDICATOR 3C TARGET PREV EST'D</u>: Increase the proficiency rate for children with IEPs against grade level standards and alternate achievement standards by: .2%</p> <p>TARGET EXCEEDED. ACTUAL DATA:</p> <p><u>Spanish</u>: 29.86% (Increased 3.06%)</p> <p><u>Math</u>: 37.82% (Increased 2.77%)</p>
<p><i>2007</i> <i>(2007-2008)</i></p>	<p><u>INDICATOR 3B</u>: Return to Baseline (98.73% for Spanish, 98.44% for Math)</p> <p><u>INDICATOR 3C</u>: Increase to 32% for Spanish and 39% for Math</p>
<p><i>2008</i> <i>(2008-2009)</i></p>	<p><u>INDICATOR 3B</u>: Maintain Baseline (98.73% for Spanish, 98.44% for Math)</p> <p><u>INDICATOR 3C</u>: Increase to 35% for Spanish and 40% for Math</p>
<p><i>2009</i> <i>(2009-2010)</i></p>	<p><u>INDICATOR 3B</u>: Maintain Baseline (98.73% for Spanish, 98.44% for Math)</p> <p><u>INDICATOR 3C</u>: Increase to 37.5% for Spanish and 42% for Math</p>
<p><i>2010</i> <i>(2010-2011)</i></p>	<p><u>INDICATOR 3B</u>: Maintain Baseline (98.73% for Spanish, 98.44% for Math)</p> <p><u>INDICATOR 3C</u>: Increase to 38.5% for Spanish and 43% for Math</p>

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for (2006):

During the 2006-07 school year PRDE put in place more rigorous controls on enrollment counts and participation data that can account for a more accurate reporting of the participation in assessments. PRDE scheduled and conducted monitoring onsite visits throughout the schools island wide.

The following were the 2006-07 improvement activities. The chart shows the progress or slippages that occurred:

Activity	Progress	Slippage
Provide additional training on eligibility criteria for the PPEA	Two training sessions were provided to all special education teachers who administer the PPEA	
Put in place and efficient system for tracking student participation	PRDE conducted on site visits before, during and after the administration period to monitor student participation and reporting.	The SIS has not completed the data validation process. We are in the process of reviewing the software that will address the duplicate student data entry that has occurred.
Validation of the assessment data base	Regular and special ed. personnel have been assigned to the assessment data management team. PRDE reviewed the assessment data for the past three years.	

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for (2006)

PRDE revised its baseline data after completing the data validation process and sets the following improvement or maintenance activities:

Activities	Timelines	Resources
Support personnel development for the teaching methodologies, teaching to grade level standards, and teaching best practices	August – May 2009	Special Education and Academic Affairs Office
Increase technical assistance and support to regular and special education teachers and service providers on teaching strategies and methodologies	August – May 2009	Special Education and Academic Affairs Office
Continue TA for regular and special education teachers on the use of accommodations for students with disabilities	August – May 2009	Special Education and Academic Affairs Office

Part B State Annual Performance Report (APR) for FFY 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: FAPE in the LRE

Indicator 4: Rates of suspension and expulsion:

- A. Percent of districts identified by the State as having a significant discrepancy in the rates of suspensions and expulsions of children with disabilities for greater than 10 days in a school year; and
- B. Percent of districts identified by the State as having a significant discrepancy in the rates of suspensions and expulsions of greater than 10 days in a school year of children with disabilities by race and ethnicity. **INDICATOR 4B DOES NOT APPLY TO PUERTO RICO.**

(20 U.S.C. 1416(a)(3)(A); 1412(a)(22))

Measurement:

- A. Percent = [(# of districts identified by the State as having significant discrepancies in the rates of suspensions and expulsions of children with disabilities for greater than 10 days in a school year) divided by the (# of districts in the State)] times 100.
- B. Percent = [(# of districts identified by the State as having significant discrepancies in the rates of suspensions and expulsions for greater than 10 days in a school year of children with disabilities by race ethnicity) divided by the (# of districts in the State)] times 100.

Include State’s definition of “significant discrepancy.”

FFY	Measurable and Rigorous Target
2006	<i>Maintain the baseline percentage (.003%)</i>

Indicator 4(a)

Actual Target Data for FFY 2006:

In previous years this report shows no student suspended for more than 10 days. For this year 2006-2007, The Report of children with Disabilities Unilaterally Removed or Suspended/Expelled for more than 10 days (618) data, Table 5), Annual Report of Children Served Shows 23 students removed or suspended/excelled for more than 10 days. This represents a .002% (231/97,284) of the total student based on child count report. PRDE met its target for this indicator and will address continuing activities of maintenance to keep low these percentages.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

Activity	Progress	Slippages
1. Revisit the development of the manual for positive behavior supports and functional behavior analysis to adopt a final document and train personnel throughout the educational system.	A revisions of the manual for positive behavior supports and functional behavior was made on October. This document give the opportunity to teachers and school Directors to clarify concepts to work with students that had been suspended. A final version of the instructions to complete the document will be out by early March 08 to continue with the corresponded dissemination and teaching assistance.	

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2006

[If applicable]

Consistent procedures with requirements over the discipline management are observed and placed in school communities. An effective dissemination of the discipline procedures contribute to a small amount of suspensions.

When a student of special education behaved in an inappropriate manner the school Discipline Committee met in order to discuss the situation. School Directors, Special Education teacher, social workers and even school counselors if available, made decisions upon the inappropriate behavior looking over the facts that influence it. A behavior regarding a student’s disability has to be discussed by the Discipline Committee and IEP team member should be invited to participate. Every school determination must consider students and school communities as well. For the contrary if the conduct deals nothing with the student disability the student school regulations apply to the special education students with correspondent sanctions. The *Manual the Procedimientos de Educación Especial* includes the specific steps for disciplinary procedure.

There is a great effort to keep and maintain students in the school setting. Other alternatives for disciplinary methods or strategies are established by schools that lead the student to confront his/her wrong behavior but also attend to classes.

Activity	Timelines	Resources
1. Personnel training for the use of the manual for positive behavior supports and functional behavior analysis	August 2008	Special Education General Supervisors
2. Continue to support regular and education teachers in the use of best practices for discipline procedures.	On-going	Special Education General and District Supervisors

Part B State Annual Performance Report (APR) for FFY 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: FAPE in the LRE

Indicator 5: Percent of children with IEPs aged 6 through 21:

- A. Removed from regular class less than 21% of the day;¹
- B. Removed from regular class greater than 60% of the day; or
- C. Served in public or private separate schools, residential placements, or homebound or hospital placements.

(20 U.S.C. 1416(a)(3)(A))

Measurement:

- A. Percent = [(# of children with IEPs removed from regular class less than 21% of the day) divided by the (total # of students aged 6 through 21 with IEPs)] times 100.
- B. Percent = [(# of children with IEPs removed from regular class greater than 60% of the day) divided by the (total # of students aged 6 through 21 with IEPs)] times 100.
- C. Percent = [(# of children with IEPs served in public or private separate schools, residential placements, or homebound or hospital placements) divided by the (total # of students aged 6 through 21 with IEPs)] times 100.

FFY	Measurable and Rigorous Target
2006	A. Special education students who spent less than 21% of the day outside regular class = 73.5% B. Special education students who spent greater than 60% of the day outside regular class= 14.8% C. Special education students placed in private/public separate schools; residential institutions; placed in hospitals and homebound = 1.32%

Actual Target Data for FFY 2006: **A) 81%; B) 10%, C) 0.36%**

Every year PRDE collects data on students' placement for 618 data. Looking over the students' IEP the data help to identify the least restrictive placement as stated by the IEP team. The data for this indicator was collected directly from 618 Data, Table 3, IDEA Implementation of FAPE requirements. The data collected for this table was given by teachers and/certify by school directors and District Supervisors. Because we are in a transition from our last data base system SIPPE to SEASWEB data was collected from the perfiles filled out by teachers in May 2007 and validated in a paper count manner for the reporting.

¹ At the time of the release of this package, revised forms for collection of 618 State reported data had not yet been approved. Indicators will be revised as needed to align with language in the 2005-2006 State reported data collections.

Table 3 shows that 72,825 students were placed inside the regular class 80% or more of the day, this represent 81% (72825/89815) of the students based in child count. Ten percent (8629/89815) were removed from regular class greater than 60%, referring to self-contained classroom or partial integration. A total of 317 students were served in private separate schools, residential placements or homebound or hospital, which represents 353% (317/89815). Less than .0009% of our students are in correctional facilities.

The data for 2005-2006 was requested by OSEP in order to determine Puerto Rico’s progress. 54,638 students were placed in regular classes and were removed from regular class less than 21% of the day. This represents 62.1% of the total amount of students aged from 6 to 21 (54638/88006). A total of 13,719 were removed from regular classes more than 60% of the day. This is the 15% of the students. A total of 585 students were served in private/public separate schools, residential institutions, or homebound or hospital, which represents 0.665% (585/88006). PRDE improve their targets and efforts will continue to keep this percentage.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006

PRDE is proud that it met and exceeded its targets. PRDE gave particular attention to train special and regular teachers regarding students support, accommodations, modifications, materials adaptations and related services including use of assistive technology. In 2006-2007 meetings and training were given to provide and improve the understanding and importance of accommodations in the regular classroom. Progress and slippage with the improvement activities is listed below.

Improvement Activity	Progress	Slippages
-Establish working teams by school districts to check the information, identify errors, and correct the data	Revisions were made to validated data included in Table 3. Numbers were verified and reports were corrected with new data.	
-Once validated, ensure that all documents and reports reflect the revised data		
-Revise the actual computerized programming in order to ensure data quality and precision	A new data base system is in the initial steps for Special Education. The unit of Monitoring and data information will be restructuring in the next month.	
-Evaluate and recommend to pertinent PRDE officials the need to increase the human resources in order to ensure appropriate data management		

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2006

PRDE has no revisions for to make on Indicator 6 at this time. However PRDE plans to continue the provision of appropriate special education services; continue follow up trainings on accommodations, curriculum adaptation and modification; and maintain special education support to regular and special education teachers.

Part B State Annual Performance Report (APR) for FFY 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: FAPE in the LRE

Indicator 6: Percent of preschool children with IEPs who received special education and related services in settings with typically developing peers (i.e., early childhood settings, home, and part-time early childhood/part-time early childhood special education settings).

(20 U.S.C. 1416(a)(3)(A))

Measurement: Percent = [(# of preschool children with IEPs who received special education services in settings with typically developing peers) divided by the (total # of preschool children with IEPs)] times 100.

FFY	Measurable and Rigorous Target
2006	Percentage of preschool IEP students receiving services with typically developing peers 74%

Actual Target Data for FFY 2006:

PRDE annually collects data on IEP students served by environment or placement alternative, ages 3 to 5. The data collection for this indicator works in the same manner as that for IEP student age 6-21 served. Data from school, school districts, Head Start, Early Head Start, Child care and others was collected and reported in 618 data, table 3: *IDEA implementation of FAPE requirements* which is the primary source of information for this indicator.

The FFY 2006 Child Count report shows the following data:

Total number of preschool IEP students (FFY 2006)
7,314

Number and percentage of preschool children with IEP receiving special education and related services with typically developing peers (FFY 2006)		
Setting	#	%
Early childhood setting	5,222	71%
Home	853	12%
Service Provider Location	94	1%

TOTAL	6,169	84%
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Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

PRDE is proud to report that it surpassed its FFY 2006 target set for this indicator (Target of 74% with Actual Target Data of 84%). Collaboration efforts between PRDE, Head Start, and Early Head Start concessionaries regarding preschool services and best practices was one of the priorities this year. Trainings were given to work on administrative issues but also with educational procedures to ensure quality and proper services to the students. Discussions island wide with preschool teachers offer better opportunities to the students and encourage them and IEP team member to considered other alternatives for placement including plenty participation with their peers in activities appropriated for their age and closer to typically students as well.

Parents request on placing their children closer to regular settings and or closer to their peers helps with the compliance on this indicator but also to the student general education because of their participation in the regular and in appropriated activities for their age.

Activity	Progress	Slippages
1. Intensify interagency training regarding preschool services, best practices, and the provision of preschool services in typical environments.	Training and follow up training was given to Special Education administrative staff, general and district supervisors, preschool teachers and Head start and Early Head Start concessionaries personnel island wide. Technical assistance took place by individual visit to school or concessionaries and also by phone calls.	N/A
2. Continue and intensify monitoring of the implementation of the interagency agreements with Part C for a smooth transition process of preschools who exit Early Intervention Services and are eligible to Part B Services.	Interagency agreement is in place. Meetings with Head Start Programs coordinators and <i>Avanzando Juntos</i> Program (Health Department, PART C) took place during the last semester in order to clarify terms and procedures. The IEP was revised to include a specific sheet for transition services (Service Program 5b) and another for placement discussions. Personnel working with Eligibility Determination Pilot at the CSEE were alert of taking care of Part C referrals and Instructions were given to Part C coordinators (APNI) by the Associated Secretary to keep on tracking the referrals up to the completion of the process.	N/A
3. Provide systematic training and technical assistance to school districts and schools regarding assessment, eligibility determination, placement decisions, preschool curriculum,	Training and follow up training was given to Special Education administrative staff, general and district supervisors, preschool teachers and Head start and Early	N/A

<p>evaluation of outcomes.</p>	<p>Head Start concessionaries personnel island wide. Technical assistance took place by individual visit to school and also by phone.</p> <p>The Manual for IEP development includes examples that show how a teacher and the IEP team members can elaborate students' goals and objectives base on the students' disabilities and in appropriate activities for their age.</p>	
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Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2006

PRDE has no revisions for to make on Indicator 6 at this time. However PRDE plans to continue the provision of appropriate special education services; continue follow up trainings on accommodations, curriculum adaptation and modification; and maintain special education support to regular and special education teachers.

Part B State Annual Performance Report (APR) for FFY 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: FAPE in the LRE

Indicator 7: Percent of preschool children with IEPs who demonstrate improved:

- A. Positive social-emotional skills (including social relationships);
- B. Acquisition and use of knowledge and skills (including early language/communication and early literacy); and
- C. Use of appropriate behaviors to meet their needs.

(20 U.S.C. 1416 (a)(3)(A))

Measurement:

A. Positive social-emotional skills (including social relationships):

- a. Percent of preschool children who did not improve functioning = [(# of preschool children who did not improve functioning) divided by the (# of preschool children with IEPs assessed)] times 100.
- b. Percent of preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers = [(# of preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers) divided by the (# of preschool children with IEPs assessed)] times 100.
- c. Percent of preschool children who improved functioning to a level nearer to same-aged peers but did not reach it = [(# of preschool children who improved functioning to a level nearer to same-aged peers but did not reach it) divided by the (# of preschool children with IEPs assessed)] times 100.
- d. Percent of preschool children who improved functioning to reach a level comparable to same-aged peers = [(# of preschool children who improved functioning to reach a level comparable to same-aged peers) divided by the (# of preschool children with IEPs assessed)] times 100.
- e. Percent of preschool children who maintained functioning at a level comparable to same-aged peers = [(# of preschool children who maintained functioning at a level comparable to same-aged peers) divided by the (# of preschool children with IEPs assessed)] times 100.

If a + b + c + d + e does not sum to 100%, explain the difference.

B. Acquisition and use of knowledge and skills (including early language/communication and early literacy):

- a. Percent of preschool children who did not improve functioning = [(# of preschool children who did not improve functioning) divided by the (# of preschool children with IEPs assessed)] times 100.
- b. Percent of preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers = [(# of preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers) divided by the (# of preschool children with IEPs assessed)] times 100.
- c. Percent of preschool children who improved functioning to a level nearer to same-aged peers but did not reach it = [(# of preschool children who improved functioning to a level nearer to same-aged peers but did not reach it) divided by the (# of preschool children with IEPs assessed)] times 100.

- d. Percent of preschool children who improved functioning to reach a level comparable to same-aged peers = [(# of preschool children who improved functioning to reach a level comparable to same-aged peers) divided by the (# of preschool children with IEPs assessed)] times 100.
 - e. Percent of preschool children who maintained functioning at a level comparable to same-aged peers = [(# of preschool children who maintained functioning at a level comparable to same-aged peers) divided by the (# of preschool children with IEPs assessed)] times 100.
- If a + b + c + d + e does not sum to 100%, explain the difference.
- C. Use of appropriate behaviors to meet their needs:
- a. Percent of preschool children who did not improve functioning = [(# of preschool children who did not improve functioning) divided by the (# of preschool children with IEPs assessed)] times 100.
 - b. Percent of preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers = [(# of preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers) divided by the (# of preschool children with IEPs assessed)] times 100.
 - c. Percent of preschool children who improved functioning to a level nearer to same-aged peers but did not reach it = [(# of preschool children who improved functioning to a level nearer to same-aged peers but did not reach it) divided by the (# of preschool children with IEPs assessed)] times 100.
 - d. Percent of preschool children who improved functioning to reach a level comparable to same-aged peers = [(# of preschool children who improved functioning to reach a level comparable to same-aged peers) divided by the (# of preschool children with IEPs assessed)] times 100.
 - e. Percent of preschool children who maintained functioning at a level comparable to same-aged peers = [(# of preschool children who maintained functioning at a level comparable to same-aged peers) divided by the (# of preschool children with IEPs assessed)] times 100.
- If a + b + c + d + e does not sum to 100%, explain the difference.

FFY	Measurable and Rigorous Target
2006	<p style="text-align: center;"><i>Not Applicable</i></p> <p style="text-align: center;"><i>Baseline, Rigorous Targets, Improvement Activities required for FFY 2009 APR due on February 1, 2010</i></p>

Overview of Issue/ Description of System or Process:

Background

In order to comply with the requirements for this indicator, PRDE received intense technical assistance from the Early Childhood Outcomes Center (ECO) and the South East Regional Resource Center (SERRC) during August, September, and October 2006, and has continued a series of technical assistance activities since that time. A two day technical assistance activity was held at the end of August 2006, and several teleconferences took place during the following months. ECO provided documentation, scales for evaluating progress, and training on best practices to evaluate preschool outcomes in the three areas included in this indicator (positive emotional skills, acquisition and use of knowledge and skills, and the use of appropriate behaviors to meet needs). PRDE personnel translated the documents, including ECO Child Outcomes Summary Form (COSF), which was selected for the

gathering of data. PRDE is using the ECO criteria for defining “comparable to same aged peers” (special education students who receive a 6 or a 7 on the COSF scale).

On October 5 and 6, 2006, PRDE conducted a training with ECO and SERRC resources for supervisors, teachers, and Head Start representatives identified to lead the implementation of the indicator. Following that first training, PRDE’s leadership personnel have provided continuous training activities and technical assistance to all regions and school districts. These activities included administrative, related services and teaching personnel, in an effort to provide the basic understanding of the requirement, the outcomes areas, and the process to gather the data.

Initially, OSEP’s reporting requirements for this indicator as laid out for the FFY 2004 SPP submission, required baseline and rigorous target data be established and included with the February 1, 2008 FFY 2006 APR submission. At that time and with that understanding, PRDE proposed to choose a sample of children entering preschool services from August 1, 2006 to October 31, 2006 in the Bayamón and Morovis regions as its first cohort. The criteria used for this selection was based on representativeness of these regions in terms of geographical location, size, and special education enrollment. ECO provided technical assistance in the selection of the sample. PRDE’s proposed second cohort was to include all children entering preschool programs from November 1, 2006 until June 30, 2007 island-wide.

As PRDE moved forward in implementing this initial plan, PRDE became aware of the need to develop a different approach to ensure the inclusion of sound and meaningful data for all children entering and exiting preschool services. This need was due to the fact that using the initial sampling approach, only a limited number of children from that sample that received services for more than 6 months, exited the program during 2006-2007, leading to very scarce progress data to report for the February 1, 2008 submission.

PRDE’s Revised Approach to Gathering and Reporting Data for Indicator 7

In response to these concerns, PRDE determined it was necessary to revise its approach for data collection under Indicator 7. The new approach was developed using a phase-in schedule as follows:

PHASE I. Pilot, First Cohort, and Establishment of Baseline Data

- Pilot: All children entering preschool services in the (former) Morovis Region from August 1, 2006 to October 31, 2006. This group served as a pilot both for the process and the documents.
- First Cohort: All children entering preschool services in the Arecibo, Caguas, Humacao, and Mayagüez regions from November 1, 2006 to June 30, 2007, in addition to those students who entered through the pilot group. Because of the regional restructuring, the Morovis Region no longer exists as its own region, but rather, is now a part of the Arecibo Region.

This first cohort of children whose improvement in the three areas are being measured consist of all eligible preschool children who began receiving special education services in the former Morovis Region August 1-October 31 2006 as well as all eligible preschool children who began receiving special education services in the Arecibo, Caguas, Humacao, and Mayagüez Regions November 1, 2006 through June 30, 2007. This group includes children in all preschool placement alternatives for each of the included regions. One of the factors involved in selecting regions for this cohort was whether the presence of a Special Education Service Center open and functioning efficiently within the region. As the activities and process related to this indicator are new, intensive training efforts, technical assistance and validation process are extremely necessary to ensure personnel understanding of both the process and the reporting. As such, PRDE decided it made sense to take advantage of the support for these activities that can be provided at the service centers.

Information gathered from the pilot group implementation guided changes to the process and the technical assistance needed. The total first cohort group, composed of all eligible preschool children from the Arecibo, Caguas, Humacao, and Mayaguez Regions who entered special education services from

November 1, 2006 to June 30, 2007, represents the population of children served throughout the Island, and includes data from all preschool placement settings.

Of this first cohort, those who exit preschool services during at least six months after entering during FFY 2006, FFY 2007 and 2008, will constitute the group of students whose evaluation data will be used to establish PRDE's baseline data. This baseline data will be reported in the FFY 2008 APR, due February 1, 2010. In the FFY 2007 APR, due February 1, 2009, updated progress data for the first cohort will be reported.

PHASE II. Second Cohort, and Establishment Actual Data for Comparison to First Target

- Second Cohort: All children entering preschool services island-wide during FFY 2007 (July 1, 2007 through June 30, 2008). This adds the Bayamon, Ponce, and San Juan Regions to the regions already included in the First Cohort, thus constituting all regions, and thus all entering preschool children, island wide. At the end of this phase, PRDE will have all school districts island-wide reporting entry and exit data for all preschool children.

The first reporting of the second cohort will occur in the FFY 2007 APR due February 1, 2009. Therein, the number of children in this cohort, as well as progress data with this cohort will be reported in addition to the updated progress data for the first cohort as mentioned above. In the FFY 2008 APR due February 1, 2010, wherein the baseline and measureable targets will be established based on data from the first cohort, updated progress data on the second cohort will be reported. Then, in the FFY 2009 APR, due February 1, 2011, actual data from the second cohort will be reported and compared to the target data set for FFY 2009.

Once the second cohort has been identified, the entire island will be included. As such, for every proceeding year, the next group of students entering preschool services island-wide will be identified, tracked, and reported on in accordance with the appropriate schedule. I.e., Each school year, a new cohort of children will be identified and followed through its preschool years, along with those included in previous cohorts.

Policies and procedures for the outcomes assessment

All children 3 to 5, who receive special education services for the first time will have entry data collected, using the "Resumen de Resultados de la Intervención con el Niño(a) Preescolar", a translation of ECO's COSF. This form will be completed using existing information gathered from different sources, including formal and informal evaluations of the child, teachers' and other providers' input, and parental input. Various methods for collecting and sharing information can be used, including meetings, visits, and teleconferences.

When the child exits preschool services (reaches 6 years of age, needs no more services, or is no longer eligible), after receiving services for more than six months, exit data will be gathered, using the same procedure to gather entry data, in order to determine if the child maintained a functioning comparable to same aged children, improved functioning comparable to same aged children, improved functioning near same aged children, improved functioning, but not sufficient to be near same aged children or did not improved functioning. PRDE is using the ECO criteria for defining "comparable to same age peers" (special education students who receive a 6 or a 7 on the COSF scale).

Measurement strategies to collect data

As part of PRDE's preparation for the implementation of this new indicator, it received technical assistance from ECO and SERRC. A broad analysis of the requirement and the actual status of the assessment of preschool children on the Island reflected the following:

- existing assessment processes focus on individual children, not always allowing for program's assessment and identification of strengths and weaknesses
- the existence of a variety of assessment procedures and techniques across the Island

- lack of assessment tools to measure OSEP’s preschool outcomes: positive-emotional skills, acquisition and use of knowledge and skills, and use of appropriate behaviors to meet needs

PRDE selected the ECO COSF, translated the documents, designed the process for the data collection, and provided training to school personnel and administrators.

In using the COSF form, the group will gather available information and will determine the child’s performance level, compared with same aged children, using the 7 points score provided in the form. When the child exits from preschool services, the form will be completed again, addressing the question if there was an improvement when compared with the entry level functioning.

Although this process does not require a specific tool for the assessment and functioning determination, PRDE is encouraging school districts to use the Creative Curriculum Assessment Tool. This tool is based on developmental stages for preschool aged children and offers a qualitative measure of functioning in the four major areas of development: social-emotional, physical, cognitive, language. A brief description of the steps taken for the use of this tool will be included further in this report.

On an ongoing basis, school districts and schools will complete forms of children entering and exiting preschool services, and will report the data to the Central Level Special Education Program for its analysis and further reporting.

Baseline Data (For FFY 2006: Entry Data and Progress Data)

Baseline data will not be established until the FFY 2008 APR due February 1, 2010. For this FFY 2006 APR, only entry and progress data will be reported. The following charts show progress reports for those children who entered and exited special education services from the first cohort (2006-2007), after at least six months of services.

A. Positive social-emotional skills (including social relationship):	Number of children	% of children
a. Percent of preschool children who did not improved functioning	34	27 %
b. Percent of preschool children who improved functioning, but not sufficient to move nearer to function comparable to same aged peers	27	22%
c. Percent of preschool children who improved functioning to a level nearer to same aged peers, but did not reach	35	28%
d. Percent of preschool children who improved functioning to reach a level comparable to same aged children	11	9%

e. Percent of preschool children who maintained functioning at a level comparable to same aged peers	17	14%
Total	N= 124	100%

B. Acquisition and use of knowledge and skills (including early language/communication and early literacy):	Number of children	% of children
a. Percent of preschool children who did not improved functioning	42	34%
b. Percent of preschool children who improved functioning, but not sufficient to move nearer to function comparable to same aged peers	43	35%
c. Percent of preschool children who improved functioning to a level nearer to same aged peers, but did not reach	26	21%
d. Percent of preschool children who improved functioning to reach a level comparable to same aged children	4	3%
e. Percent of preschool children who maintained functioning at a level comparable to same aged peers	9	7%
Total	N= 124	100%

C. Use of appropriate behavior to meet their needs	Number of children	% of children

a. Percent of preschool children who did not improved functioning	35	28.2%
b. Percent of preschool children who improved functioning, but not sufficient to move nearer to function comparable to same aged peers	25	20.1%
c. Percent of preschool children who improved functioning to a level nearer to same aged peers, but did not reach	29	23.3%
d. Percent of preschool children who improved functioning to reach a level comparable to same aged children	11	8.8%
e. Percent of preschool children who maintained functioning at a level comparable to same aged peers	24	19.3%
Total	N= 124	100%

Discussion of Baseline Data (For FFY 2006: Entry Data and Progress Data)

The entry/progress data presented above was collected for the first time, and must be used as a starting point to look at how schools and school districts assess progress and preschool functioning. Through its analysis, a needs assessment was done, and several steps and activities have been identified and will be carried out, in order to ensure both data accuracy and use of strong and sound assessments process.

PRDE expects to use the knowledge and experience gained in preparing for this first progress report and analysis to modify the COSF formats in order to make them more user friendly, intensify the training, and refine the data collection and analysis process.

Measureable and Rigorous Targets

Measureable and Rigorous Targets will be established based on exiting data from the first cohort in FFY 2008 APR due February 1, 2010.

Discussion of Improvement Activities/Timelines Resources

Below PRDE reports the activities it has carried out as well as upcoming activities anticipated for the coming year.

Activities Carried-Out

The following activities have been carried out to ensure compliance with this indicator:

- Training to leadership personnel (October 2006)
- Training to preschool teachers, special education supervisors (October, November, December 2006)
- Development of forms to collect the entry data (October 2006)
- Translation of COSF and other materials (October-November 2006)
- Collection of initial data (November 2006)
- Analysis of initial data (Jan to March 2007)
- Adjustments, modifications to documents and process (May 2007)
- Training, technical assistance and verification visits (starting January 2007, still ongoing)
- Collection of data and follow up for children entering services in the first cohort from Nov. 1, 2006 to June 30, 2007 (August to October 2007)
- Analysis, validation and report design (November 2007 to January 2008)
- PRDE received technical assistance from SERRC in strategies to analyze and present data. (August 2007 to January 2008)
- Acquisition and initial training of the Creative Curriculum Assessment Tool, to be used for the ongoing assessment of children progress throughout the preschool stage. This tool is widely used in Puerto Rico by Head Start Programs and can constitute a shift in the manner in which schools collect and maintain progress data for preschool children. An initial training was provided, in collaboration with a Head Start expert to leadership PRDE's personnel during March 2007. The materials were distributed to the school districts and schools after the initial training.

In order to establish a solid basis for the implementation of this Indicator, PRDE has carried out intensive coordination and analysis of programs and teachers' needs in order to ensure improved services for very young children. In collaboration with SERRC, PRDE has determined the need for improved teacher skills in early childhood typical development, assessment of preschool aged children. Discussion of issues and coordination with potential resources with SERRC's leadership, have taken place during the past months. Also, the initial design for this training has been put up, SERRC's support. A training for teachers is being planned to be carried out during this spring.

Revisions, with Justification, to Improvement Activities/Timelines/Resources:

PRDE is to establish its "Improvement Activities/Timelines/Resources" in the FFY 2008 APR due February 1, 2010. However, in response the "Puerto Rico Part B FFY 2006 SPP/APR Status Table" comment that OSEP could not accept the below listed activities because they do not cover the remaining years of the SPP. PRDE seeks to revise its SPP in accordance with the information established in this APR submission for FFY 2006 and to include the following upcoming activities.

Upcoming Activities

The following activities are scheduled over the coming months:

- Individual technical assistance to school districts included in the second cohort (began in September 2007 and continuous throughout January 2008-May 2008)
- Training to teachers and other personnel on the use of Creative Curriculum Assessment Tool (March 2008)
- Teacher training in order to improve teaching skills to very young children (March 2008-May 2008)
- Identification and request of teaching materials and guides to improve preschool children learning (January to February 2008)

- Verification of data gathered (February to March 2008)
- Continue to collect exit data for children in the first cohort and the second cohort (February 2008 to June 2008)
- Collect data for exiting children and compare to entry level data (ongoing, until June 2008)
- Analyze and compare data for exiting children to establish progress data for the indicator (September 2008-October 2008)
- Start collecting entry level data for the third cohort (July 2008-June 2009)
- Analyze alternatives to create an online reporting program to improve data transmittal from local schools to Central Level and management (April 2008)
- In order to ensure implementation of the Indicator, data collection and accuracy, PRDE plans to implement the following activities are on an ongoing basis:
 - Include the preschool outcomes requirements as part of the state monitoring system
 - Conduct periodic revisions of completed forms to ensure quality and completeness and identify and correct technical assistance needs
 - Analyze data by school districts and regions to identify gaps, errors, and possible non compliance with the Indicator.

Part B State Annual Performance Report (APR) for FFY 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: FAPE in the LRE

Indicator 8: Percent of parents with a child receiving special education services who report that schools facilitated parent involvement as a means of improving services and results for children with disabilities.

(20 U.S.C. 1416(a)(3)(A))

Measurement: Percent = [(# of respondent parents who report schools facilitated parent involvement as a means of improving services and results for children with disabilities) divided by the (total # of respondent parents of children with disabilities)] times 100.

FFY	Measurable and Rigorous Target
2006 (2006-2007)	89.6%

Actual Target Data for FFY 2006: 76%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

Review of Process

For FFY 2006, PRDE continued with the same process for collection of data for Indicator 8 as described in its SPP submitted February 1, 2007. Therein, PRDE explained that it was using the *Inventario para Padres de Estudiantes que Reciben Servicios de Educación Especial*, a Spanish translation based on the National Center for Special Education Accountability and Monitoring’s Parent Survey—Special Education (version 2). This survey was translated, adapted and used to measure parent involvement in their children’s special education services for use in 2005-2006. For 2006-2007, some grammatical changes were made to the version used in 2005-2006 but no substantive changes were made. All questions, substantive areas and information requested remain the same as approved by OSEP last year.

The parent inventory addresses three means for facilitating parental involvement: (i) schools as facilitator of the process, (ii) the teachers as facilitators, and (iii) a third scale related to the general view of the special education program. Parents who answered “bastante” or “mucho” (numbers 4 and number 5 on a 1 to 5 scale) on questions regarding parental involvement, were counted as reporting that schools facilitated parent involvement as a means of improving services and results of children with disabilities.

FFY 2006 Sample

A random selection of parents was used for survey administration. As PRDE’s special education population for FFY 2006 was 97,284, the sample size would need to be at least 383 parents of students receiving special education services for 2006-2007.

Determination of the required sample was defined by the following formula:

$$s = \frac{X^2NP(1-P)}{d^2(N-1) + X^2P(1-P)}$$

Where:

- s = required sample size
- X² = the table value of chi-square for 1 degree of freedom at the desired confidence level (3.841)
- N = population size
- P = the population proportion (assumed to be .50 since this would provide the maximum sample size)
- d = the degree of accuracy expressed as a proportion (.05)

Accordingly, with a universe/population size (N) of 97,284:

$$\begin{aligned}
 s &= \frac{(3.841)(97,284)(.50)(1-.50)}{(.05)^2(97,284-1) + (3.841)(.50)(1-.50)} \\
 &= \frac{93,416.961}{.0025(97,283) + .96025} \\
 &= \frac{93,416.961}{243.2075 + .96025} \\
 &= \frac{93,416.961}{244.16775} \\
 &= 382.593365 \\
 \mathbf{s} &= \mathbf{383 \text{ parents}}
 \end{aligned}$$

As such, in order to have sufficient sample size, PRDE must have issued surveys to at least 383 parents.

The parents of a total of 384 students with disabilities were selected by the sampling method to receive the inventory. A total of 188 of the 384 parents selected for the sample completed and returned inventories. This constitutes a 49% participation rate of the sample group. This survey depends

absolutely on parent responses. Under statistics approaches, having that % of participation, it is appropriate to consider such results as a representation of the parents.

Also, it is important to note that PRDE’s sampling method allows us to collect feedback from a wide variety of parents including variation and representation by school level, student placement and almost all types of disabilities

Survey Results for FFY 2006

A total of 143 of the 188 completed surveys reported that schools facilitated parental involvement as a means to improving services and outcomes for their children with disabilities. This represents 76% of the respondent parents (173/193 x 100).

Data Year	(1) # respondent parents who report schools facilitated parent involvement as a means of improving services and results for children with disabilities	(2) # of respondent parents of children with disabilities	[(1)/(2)] X 100 = Percent
2006-2007	143	188	76%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 06:

Activities proposed for this year were held as established for Indicator 8 in the SPP/FFY 2005 APR.

Activity	Progress	Slippages
Revise and modify the survey	As discussed above, PRDE employed the same survey document approved by OSEP last year. The survey document was revised and certain grammatical changes were made. No substantive changes were made.	N/A
Increase parental responses to the survey	PRDE implemented many activities and efforts in attempt to increase the parental responses to / participation in the survey. PRDE central level staff worked directly with general supervisors who share the responsibility to inform selected parents of the survey and following up to ensure the surveys were received and returned. Parents have the option to return the completed surveys by mail or through the schools. PRDE extended the due date for the survey twice in order to receive more surveys. The final day for survey submission was Dec. 1, 2007.	The percentage of parents responding to the survey did not increase this year. Rather, it remained approximately the same. Participation for FFY 2005 was 50% (193/384) as opposed to 49% for FFY 2006 (188/384).
Disseminate the results of the parent survey to regions and central level and other interested	The results of the survey were disseminated through the general education	N/A

<p>parties.</p>	<p>supervisor who has the responsibility to keep the district supervisors, the school directors, and teachers informed. Several meetings were conducted through the regions with PRDE maintain in its documentation the agendas for these meetings which include time for discussion of survey results, recommendations for improvement with this indicator, and some recommended activities to foster parent involvement.</p>	
<p>Training and technical assistance to school and district personnel on facilitating parental involvement</p>	<p>As discussed above, PRDE included training and technical assistance along with its dissemination of the survey results to school and district personnel.</p>	<p>N/A</p>
<p>Foster joint parent/teacher trainings</p>	<p>PRDE has worked to ensure there are plenty of opportunities for parents to be involved not only in mandatory activities such as IEP revisions and other procedures but also to learn more from SAEE, learn new information, and collaborate and truly feel as full participating and collaborating partner. In addition to OSEP requirements for parental participation, the State Legal Case of Rosa Lydia Vélez requests evidence of these efforts as well. Parents are invited to participate and to collaborate. Their perspectives are very appreciated from PRDE as PRDE recognizes the value of parents' perspective and the important of their participation. The following are examples of joint parent/teacher trainings during FFY 2006.</p> <ul style="list-style-type: none"> • The Special Education Congress in November is a wonderful example of joint parent/teacher trainings and activities island wide. The Congress is held and sponsored by the PRDE SAEE. • In collaboration with APNI (Association of Parents with Kids with Disabilities), PRDE sponsored two annual island wide activities that are joint parent/teacher trainings. Each year a different topic is covered in those meetings and a large amount of parents and teachers participate in and benefit from this activity. The meetings were held in San Juan and Guayama for diversity in geographic location and to 	<p>N/A</p>

	<p>increase participation islandwide.</p> <ul style="list-style-type: none"> • The Department of Sports and Recreation also collaborated with PRDE SAEF in the celebration of a National Day of Recreational Games and Sport for children with disabilities. This activity was very well attended with enthusiastic participation of parents, teachers and students. • PRDE participates in a variety of health clinics in collaboration with University of Puerto Rico sponsored by Mayors in some municipalities (e.g., Dorado, Yabucoa) as well as some sponsored by non-profit organizations. The PRDE SAEF disseminates information and services at these clinics and is able to connect with parents and local education at these events. • Also, PRDE celebrates the <i>Autism Family Day</i> in collaboration with Alianza de Autismo and Annual Congress of The Deaf and Blind parents lead by Deaf and Blind parents association. <p>Evaluations conducted and commentaries from the parents reflected parent's satisfaction and willingness to support these kinds of efforts. As such, PRDE plans to continue with such activities and joint trainings.</p>	
<p>Monitor the implementation of the established procedures for fostering parent involvement.</p>	<p>During FFY 2006, PRDE developed a monitoring instrument for monitoring the implementation of the established procedures for fostering parent involvement. This instrument is being implemented into the PRDE SAEF monitoring guides and will be included in monitoring visits going forward.</p>	<p>N/A</p>
<p>Administer the survey, collect data and measure progress on parent involvement</p>	<p>Completed for FFY 2006.</p> <p>For FFY 2007, PRDE has made the determination to adjust the timing of the survey administration, collection, analysis, etc. As soon as the official child count is submitted the process of defining and selecting the sample begins (February 2008). PRDE expects to begin distribution of the survey in March 2008 and complete administration of the survey by April 2008. PRDE will analyze results May 2008-July 2008 and disseminate the results in August</p>	<p>.N/A</p>

	2008. August is PRDE's back-to-school month and many meetings and trainings take place during the first days of school. This is a good opportunity for disseminating the information to schools and to reinforce through recommended activities the importance of parents and teacher collaboration.	
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Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 06

PRDE plans to continue with its currently state Improvement Activities. No revisions are being sought at this time for proposed targets either.

Part B State Annual Performance Report (APR) for FFY 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: Disproportionality

Indicator 9: Percent of districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification.

(20 U.S.C. 1416(a)(3)(C))

Measurement:

Percent = [(# of districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification) divided by the (# of districts in the State)] times 100.

Include State’s definition of “disproportionate representation.”

Describe how the State determined that disproportionate representation of racial and ethnic groups in special education and related services was the result of inappropriate identification, e.g., monitoring data, review of policies, practices and procedures under 618(d), etc.

FFY	Measurable and Rigorous Target
2006	N/A

Actual Target Data for FFY 2006: N/A

Discussion:

As discussed in the SPP and reinforced by OSEP’s Analysis in the “Puerto Rico Part B SPP/APR Response Table” sent to PRDE along with its APR Determination Letter dated June 15, 2007, this indicator does not apply to Puerto Rico.

Part B State Annual Performance Report (APR) for FFY 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: Disproportionality

Indicator 10: Percent of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification.

(20 U.S.C. 1416(a)(3)(C))

Measurement:

Percent = [(# of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification) divided by the (# of districts in the State)] times 100.

Include State’s definition of “disproportionate representation.”

Describe how the State determined that disproportionate representation of racial and ethnic groups in specific disability categories was the result of inappropriate identification, e.g., monitoring data, review of policies, practices and procedures under 618(d), etc.

FFY	Measurable and Rigorous Target
2006	N/A

Actual Target Data for FFY 2006: N/A

Discussion:

As discussed in the SPP and reinforced by OSEP’s Analysis in the “Puerto Rico Part B SPP/APR Response Table” sent to PRDE along with its APR Determination Letter dated June 15, 2007, this indicator does not apply to Puerto Rico.

Part B State Annual Performance Report (APR) for FFY 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: Effective General Supervision Part B / Child Find

Indicator 11: Percent of children with parental consent to evaluate, who were evaluated within 60 days (or State established timeline).

(20 U.S.C. 1416(a)(3)(B))

Measurement:

- a. # of children for whom parental consent to evaluate was received.
- b. # determined not eligible whose evaluations were completed within 60 days (or State established timeline).
- c. # determined eligible whose evaluations were completed within 60 days (or State established timeline).

Account for children included in a but not included in b or c. Indicate the range of days beyond the timeline when the evaluation was completed and any reasons for the delays.

Percent = [(b + c) divided by (a)] times 100.

FFY	Measurable and Rigorous Target
2006 (2006-2007)	100%

Actual Target Data for FFY 2006: 82.85% for timely evaluation (30 days),
37.9% for timely evaluation AND determination (60 days).

Evaluation conducted within 30 days

Date Year	a. # of children with parental consent to evaluate	d. # of evaluations held within 30 days	% evaluations held within PR timeline (a/d)
2006-2007	18,565*	15,381	<u>82.85%</u>

*A total of 18,821 children with parental consent to evaluate were initially received, however 256 parents missed their appointments and failed to re-schedule despite efforts from PRDE to do so.

Eligibility Determination made within 60 days

Data Year	a. # of children with parental consent to evaluate	b. # determined not eligible within 60 days	c. # determined eligible within 60 days
2006-2007	18,565*	830	6,206

Data Year	b+c	Divided by a	Times 100	%
2006-2007	7,036	.37899	37.90	<u>37.9%</u>

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

As noted in the Puerto Rico’s SPP, PRDE faces state established timelines of 30 days for initial evaluations and 60 days for eligibility determination. Consequently, Puerto Rico faces shorter timelines than the federal requirements. Because of these state established timelines, Puerto Rico reports its actual target data for this indicator in regards to both required timelines.

While Puerto Rico was not able to meet the 100% mandatory target for this compliance indicator, it has shown significant improvement over the past year and already is able to anticipate it will demonstrate even further significant improvement for FFY 2007. The following table compares Puerto Rico’s improvement in complying with these two timelines:

Data Year	30 Day Eligibility Determination	60 Day Eligibility Determination
FFY 2005 (2005-2006)	70.2%	21.7%
FFY 2006 (2006-2007)	82.9%	37.9%

Puerto Rico’s timeliness with the 30 day initial evaluation timeline improved 12.7% and with the 60 day eligibility determination 16.2%. While Puerto Rico recognizes there is still work to do to come into 100% with each of these timelines, Puerto is proud of the progress and excited to continue with the efforts it has initiated in improving performance with this indicator.

Impact of the Special Education Service Centers on Improving Performance

As explained in detail in the SPP, upon conducting an analysis of performance under this indicator by educational region, PRDE recognized what it believed to be the positive impact the presence of Special Education Service Centers had upon performance with this indicator. During 2005, PRDE made the decision to establish service centers across the entire island with plans to open a total of ten service centers island-wide. This number was based on the prior organizational structure of ten educational regions. PRDE has since restructured its educational regions and now operates within the structure of seven regions. As such, three regions will benefit from the presence of two service centers within their region while the other four regions will have only one service center located within their region.

The service centers function like one-stop shops where children with disabilities can receive all information and most services needed in one location. During 2006-2007, only four service centers had been established and were in operation (Caguas, Humacao, Mayaguez, Ponce). As discussed in the SPP, parents’ ability to register their children and make appointments for evaluations at the service centers had a positive impact on performance in these regions under this indicator. During 2007-2008, PRDE was able to open five more service centers (San German, Bayamón, Morovis, Arecibo, and San Juan). One additional service center is scheduled to be opened in the coming year (Fajardo).

PRDE implemented a pilot program in FFY 2006 in the four initial service centers. The pilot program involved establishing a team at each service center devoted to working on completing students' eligibility determinations following initial evaluation. This same team would be responsible for coordinating the IEP meeting with the schools. This pilot has helped not only with timelines for new incoming parental consents to evaluate but also with lowering existing backlogs. Extended working hours including Saturdays were approved at the remaining service centers for these efforts. The pilot project went into effect in February 2007.

As this pilot project was not implemented until the second half of FFY 2006, the impact of the project will not be fully recognized until FFY 2007. Nonetheless, the pilot program still has had a positive impact on the FFY 2006 data. Of the four regions involved with the pilot program, three performed extremely well and significantly above the island-wide actual target data (82.9% for 30 day evaluation and 37.9% for 60 day eligibility determination) as reflected in the following:

<u>FFY 2006 Data for Regions Participating in the Pilot Program</u>		
Region	Evaluation within 30 days	Eligibility Determination within 60 days
Caguas	95.6%	71.3%
Humacao	92.7%	68.9%
Mayaguez	97.0%	86.9%
Ponce	73.6%	31.2%

Difficulties and delays with personnel recruitment had a negative impact in the Ponce Region. This delayed the implementation and impact of the pilot for FFY 2006. Parental absenteeism for initial evaluation appointments was a major cause for delays as well.

For the five new service centers opened during FFY 2006, the ability of parents to have their children evaluated at the service centers seems to have already had a positive impact on performance on performance with the evaluation timelines. In November 2007 (during FFY 2007), these five service centers began managing eligibility determinations on site as well. These service centers are expected to recruit the necessary staff during PRDE's agency-wide recruitment period in May 2008 and have them in their positions by August 2008 in order to fully implement the pilot program at that time. The following chart lists the five new service centers along with their opening date and compares their FFY 2005 and FFY 2006 performance with the 30 day evaluation timeline for the service area they cover. Comparing the percentage increase in compliance with the opening date, a clear correlation exists—the longer the service center was open during FFY 2006, the better the improvement in compliance.

Service Centers Opened during FFY 2006	Opening date	Comparison of % of initial evaluation within 30 days timelines	
		2005-2006	2006-2007
San German	November 28, 2006	67%	93%
Bayamon	March 8, 2007	71%	80%
Morovis	March 21, 2007	38%	64%
Arecibo	November 13, 2006	36%	71%
San Juan	May, 2007	45%	75%

Data Re: Those Children Not Evaluated and Receiving Eligibility Determinations within Timeline

The following charts report the range of days beyond the timeline when eligibility was determined as requested by OSEP.

Evaluated Students for FFY 2006 (2006-2007)							
Total # of children with parental consent to evaluate	Eval. within 30 days or less	Eval. within 60 days	Eval. within 90 days	Eval. within 120 days	Eval. in more than 120 days	Not Evaluated (=571)	
						Not yet eval.	No longer avail. to eval. (e.g., moved)
18,565	15,381	1,567	419	169	458	483	88
	82.85%	8.44%	2.26%	0.91%	2.47%	2.60%	0.47%

Total of Students with Initial Evaluations and Eligibility Determinations for FFY 2006 (2006-2007)					
Total # of students who requested services	Students evaluated with eligibility determinations in 60 days	Students evaluated with eligibility determinations within 90 days	Students evaluated with eligibility determinations within 120 days	Students evaluated with eligibility determinations in more than 120 days	Eligibility not yet determined
18,565	7,036	3,220	1,896	3,229	3,184
	37.9%	17.34%	10.21%	17.39%	17.15%

Update on FFY 2005 Data Reported February 1, 2007

In its FFY 2005 APR submitted February 1, 2007, PRDE reported that 2,356 of the 18,291 students who had requested services still had not been evaluated. As of November 1, 2007, that figure has dropped from 2,356 (12.88%) to 1,030 (5.63%) as a result of PRDE’s continuous work with this backlog. PRDE reported this figure along with the initial February 1, 2008 submission of this FFY 2006 APR in the “Report on Correction of Noncompliance.” PRDE has continued to work to address its backlog while at the same time continuing to work towards full compliance with timeliness requirements for incoming requests for services.

List of Activities/Progress/Slippage

The following chart summarizes the progress and slippage with the activities proposed in last year’s APR/SPP Submission.

Activities	Progress	Slippages
1. Open remaining Service	PRDE was able to open five of the six	One Service Center,

<p>Centers.</p>	<p>new Service Centers for a total of 9 Service Centers currently operating on the island. CSEE for a total of 9. All seven educational regions now have an operating Service Center.</p>	<p>Fajardo, remains to be opened. Students that would be served by the Fajarado Service Center are currently served through the other Humacao Region Service Center, which is located in Las Piedras.</p>
<p>2. Conduct a pilot project in four educational regions (Ponce, Caguas, Humacao, and Mayagüez) where eligibility determinations will occur in the service centers of the region. The personnel that will work with this pilot Project will be dedicated exclusively to eligibility determinations in order to improve the timeliness of the eligibility determinations.</p>	<p>The Eligibility Determination pilot project was conducted in the mentioned regions. The impact of this activity is clearly significant in the improvement to compliance as discussed in the analysis provided above.</p>	<p>N/A</p>
<p>3. Implement a mechanism to monitor timelines for initial evaluations</p>	<p>As discussed with OSEP during PRDE's verification visit in November 2007, once the new data base information system is fully in place and operational, PRDE will have an alert system that will notify the respective district and region about the students approaching their due date for the initial evaluation and other related timelines.</p>	<p>While the manner for implementing this mechanism has been identified and scheduled, it is not yet fully operational as the information system has not yet gone live.</p>
<p>4. Train personnel in general education process and services trainings to include and ensure timely management of the evaluation and determination process.</p>	<p>These items were added to the agenda for the general education process and services training that were held in each region island-wide during the fall of 2007. These trainings were for all special education teachers and district supervisors.</p>	
<p>5. Continue to enforce contractual terms for Corporations timely delivery of evaluation results (sanctions increase to be pay for</p>	<p>Evaluation of Corporations and Service providers' performance and a revision to the contract was made in accordance with SAEE necessities and requirements. New Corporations and individual proposal</p>	

<p>Corps.)</p>	<p>for 07-08 include a report of the services provided for 06-07. That report include information on the services provided by them, including referrals attended, students dismissal, parents request for transfer their service from one Corporation to another , referrals not attended a returned to the CSEE among other areas. This information contribute to the evaluate Corporations performance in order to renew their contract for this year.</p> <p>Corporations are sanctioned if there is a delay of more than 10 between evaluation and sending of the report of the evaluation to the Service Centers. Service Center Directors are responsible for this action and putting the sanction in place. This requirement is included in the contracts.</p>	
<p>6. Devote a team of evaluation providers for initial evaluations at each Center.</p>	<p>Service Center Personnel working in the Registration Units have the responsibility of managing initial evaluations.</p>	
<p>7. Continue to enforce compliance with timelines through case management at the Center.</p>	<p>PRDE has made the decision to not use case managers at the Service Centers. Compliance will be managed through eligibility determination pilot project.</p>	
<p>8. Revised procedure/ memorandum regarding the pilot projects discussed in activity #1 above.</p>	<p>Meetings have taken place to review the pilot program procedures for this pilot program. Revisions and amendments were made to incorporate how to work better with Part C referrals.</p>	<p>The initial memorandum of the pilot remains in place. Having Rosa Lydia Case slows down the pace of finalizing and implementing the new procedures.</p> <p>The final Memo or Circular letter will include changes in the pilot project's work with the eligibility determination process.</p> <p>Public Hearings will need to be held in accordance with IDEA regulations</p>
<p>9. Evaluate the Effectiveness of the pilot project in order to assure</p>	<p>As discussed above, the data numbers and percentages showed the improvement of having opened new</p>	

<p>best procedures for best results in implementing this project in the remaining service centers island wide.</p>	<p>service centers and placing the Eligibility Determination Pilot in four of them.</p> <p>Directors of the service centers discussed parent satisfaction in having every process and service delivered in the same place.</p>	
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Revisions with Justification to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2006:

In addition to continuing with the remaining activities above, PRDE plans to engage in the following additional improvement activities.

Activities	Timelines	Resources
<p>1, Implement the Eligibility Determination Pilot in the remaining Service Centers.</p>	<p>August 2008</p>	<p>PRDE Office of Special Ed</p>
<p>2, Evaluate options and develop guidelines for dealing with parents who miss their appointments.</p>	<p>April 2008-June 2008</p>	<p>Social workers at the CSEE</p> <p>Special Education General and District Supervisors</p>

Part B State Annual Performance Report (APR) for FFY 2006

Monitoring Priority: Effective General Supervision Part B / Effective Transition

Indicator 12: Percent of children referred by Part C prior to age 3, who are found eligible for Part B, and who have an IEP developed and implemented by their third birthdays.

(20 U.S.C. 1416(a)(3)(B))

Measurement:

- a. # of children who have been served in Part C and referred to Part B for eligibility determination.
- b. # of those referred determined to be NOT eligible and whose eligibilities were determined prior to their third birthdays.
- c. # of those found eligible who have an IEP developed and implemented by their third birthdays.
- d. # of children for whom parent refusal to provide consent caused delays in evaluation or initial services.

Account for children included in a but not included in b, c or d. Indicate the range of days beyond the third birthday when eligibility was determined and the IEP developed and the reasons for the delays.

Percent = [(c) divided by (a – b – d)] times 100.

FFY	Measurable and Rigorous Target
2006	100%

Actual Target Data for FFY 2006: 30.27%

PRDE conducted an islandwide data collection and several validation activities in order to obtain the number of children who exited Part C services whose eligibility was determined prior to their third birthday, the number of children who were found eligible and were provided special education services by their third birthday, and the number of eligible children who, at the end of the period, had not been provided with special education services. The data collected shows the following:

Table A - Data

a- # of children served in Part C referred to Part B for eligibility determination	b. # of children determined not eligible whose evaluations were conducted prior to their third birthday	c. # of children found eligible with IEP's developed and implemented by their third birthday	d. # of children for whom parental refusal to consent to evaluation caused delay in evaluation or initial services
2005	62	425	2

As directed by the measurement instructions for this indicator, children included in a (from Table A above) but not included in b, c or d must be accounted for. In applying the measurement formula to the data for FFY 2006, there is a subgroup of children included in a (children served in Part C referred to Part B for eligibility determination) that are not included in b, c, or d. Those children [a-(b+c+d)] fall within one of two categories: (e) children that exited due to transfer to another state or country whose parents chose to deny receipt of services, or (f) children that at the end of the 2006-2007 reporting period had not yet reached age three. Table B below accounts for these children that are included in a but not included in b, c, or d.

Table B – Additional Data: Accounting for children included in (a) from Table A but not included in b, c, or d.

e. # of children that exited due to transfer to another country or whose parents chose to deny receipt of services	f. # of children who had been referred to Part B and that at the end of the 2006-2007 reporting period had not yet reached age three and were still receiving services by Part C
41	496

Category e from Table B represents the subgroup of children within ‘a’ that have been referred to Part B, but exited Part C during the reporting period. These students’ exits are due either to transfer to another state or country or to denial of services.

Category f from Table B represents the subgroup of children within “a” that have been referred to Part B, but that by the end of FFY 2006 that have not yet reached the age of three in order to be eligible to begin receiving Part B services. For example, if child X was referred to Part B for eligibility determination on November 3, 2006 at 2.1 years of age (i.e., child X was born in October 2004), child X will not turn three until October, 2007. Because the reporting period covers FFY 2006 (July 1, 2006-June 30, 2007), at the end of the period covered by this report, child X had not yet turned three, and as such was not yet eligible for Part B services.

PRDE presents the measurements in two manners, first by a strict interpretation of the formula disregarding the comments following the algebraic formula, and second in order to reflect the impact of this subgroup on the indicator as indicated by the comments within the measurement definition directing states to account for all students included in a but not included in b, c, or d.

Without considering the students accounted for in Table B:

Data Year	(a – b – d)	C Divided by (a-b-d)	Times 100	= Percent
2006-2007	1941	.21896	21.896	21.9%

Accounting for the students in Table B, as directed by the measurement formula definitions:

Data Year	(a – (students accounted for in Table B))	Minus (b + d)	Into C	Times 100	= Percent
2006-2007	1468	1404	.3027	30.27	30.27%

The second measurement more accurately reports Puerto Rico’s performance with the indicator and complies with the Secretary’s directions to account for the subgroup of students included in a but not included in b, c, or d, making Puerto Rico’s actual Indicator 12 target data for FFY 2006 30.27%. Both measurements are included nonetheless.

The Secretary’s measurement instruction further direct the states to indicate the range of days beyond the third birthday when eligibility was determined and the IEP developed. The following table (Table C) provides the range of days elapsed beyond the third birthday of children whose eligibility and services were not in place by the third birthday. Reasons for the delays are discussed thereafter.

Table C. Range of days elapsed beyond the third birthday of children whose eligibility and services were not in place by the third birthday.

# of children receiving services from Part C and referred for eligibility determination during FFY 2006 and were not determined eligible or provided with services on their third birthday (a – (b+c+d+table b))	30 days delay	60 days delay	90 days delay	120 + delay	Unable to determine with data provided
979	252	200	132	291	104

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006

In comparing the percentage of compliance for the FFY 2005 reporting period (13%), and the percentage for this reporting period (30.27%), the improvement in the provision of services to eligible children at their third birthday is evident. The steps that PRDE is taking for the improvement of the services through the Special Education Service Centers, as well as the intensive training, guidance, and follow up provided to personnel in charge of the transition process is resulting in increasing the compliance with this requirement.

One major reason for delays was that a significant number of children in Part C were not referred to Part B until extremely close to their third birthdays. During the reporting period, approximately 25% of the children who received services from Part C and were referred to Part B for eligibility determination were referred within one month of their third birthday, increasing the difficulty to allow PRDE to provide timely determination and delivery of services.

It is noteworthy that Part C is administered by the Puerto Rico Department of Health while Part B is administered by PRDE. Collaboration between the two departments is managed by an Interagency Agreement. Identifying areas of the Interagency Agreement that may need to be changed or modified as well as continuously working to improve communication among Part C and Part B personnel may aid in improving performance under this indicator.

Improvement Activities/Timelines/Resources:

Activity	Progress	Slippages
1. Continue to collect and validate data on <ul style="list-style-type: none"> a) #of children served by Part C referred to Part B b) eligible for Part B services c) with IEP and services by the 3rd birthday d) not eligible for Part B 	The data collection was conducted, and a validation process was carried out.	N/A
2. Re train personnel on transition requirements. Attendance to this training will be compulsory for regional and district level special education personnel	170 special education personnel attended the trainings between February and October, 2007.	N/A
3. Issue a memorandum from the Secretary of Education regarding compliance with the transition requirements	A memorandum was issued on February 16, 2007 regarding compliance with the Part C to Part B transition requirements. This memorandum was additionally distributed and discussed in detail at the personnel trainings mentioned above.	N/A
4. Assign the preschool coordinators the responsibility for tracking the transition process of all referred children	The preschool coordinators were involved in the process of collecting and validating the data. They were assigned the responsibility to follow up on transitioning children's movement through their transition from the service request to the IEP development.	N/A
5- Design and implement special procedures to identify and process cases of children in transition who request services at the Service Centers, in order to ensure agility	In the February 16, 2007 memorandum referenced above, specific instructions were given in order to improve the compliance with the timelines.	N/A
6. Continue and intensify the monitoring of transition requirements compliance	PRDE continued to monitor entities regarding this indicator and provide on-sight technical assistance and verification visits.	N/A

In addition to the above mentioned activities, a special education supervisor at each one of the island's Special Education Service Centers was assigned the responsibility of ensuring an agile process for transitioning children. These supervisors, along with the preschool coordinators, are in charge of the follow up and coordination needed to evaluate, determine eligibility, develop the IEPs, and the coordinate services. The Service Centers have generally aided in increasing Puerto Rico's performance with several indicators over the past two years, and we feel the same is true here. This initiative was implemented in

February 2007, and has aided in the increased performance under this indicator for this reporting period, even though it did not go into effect until half-way through the reporting period. As such, we believe this initiative will have a greater impact, and not be fully appreciated, until the next year's (2007-2008) reporting period.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2007, and subsequent:

PRDE submits the following revised improvement activities, in order to address the identified hindrances to meet the FFY 2007 target.

Improvement Activities	Timelines	Resources
Create an alert in the information system (SEASWEB) for when child is about to turn 3 years old. Work to ensure such an alert functions in an efficient and effective manner.	March 2008 for creation, continuous for ensuring effectiveness.	SAEE Staff
Use the information system to generate a monthly report of the cases registered in order to better monitor compliance.	Monthly	SAEE Staff
Provide additional continuous training and technical assistance to personnel at locations with greater challenges in compliance with this indicator in order to address issues specific to such locations.	Continuous	Technical Assistance
Evaluate and identify best practices for monitoring transition in coordination with both the monitoring and technical assistance units.	June – August 2008	Compliance Unit, Technical Assistance Unit

Part B State Annual Performance Report (APR) for FFY 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: Effective General Supervision Part B / Effective Transition

Indicator 13: Percent of youth aged 16 and above with an IEP that includes coordinated, measurable, annual IEP goals and transition services that will reasonably enable the student to meet the post-secondary goals.

(20 U.S.C. 1416(a)(3)(B))

Measurement: Percent = [(# of youth with disabilities aged 16 and above with an IEP that includes coordinated, measurable, annual IEP goals and transition services that will reasonably enable the student to meet the post-secondary goals) divided by the (# of youth with an IEP age 16 and above)] times 100.

FFY	Measurable and Rigorous Target
2006	100%

Actual Target Data for FFY 2006: 58.33%

a. Number of students aged 16 and above	b. Certifications Received	c. % of students with transition goals in their IEP (b/a)
15,357	8,958	58.33%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

PRDE's collection of data for Indicator 13 adhered to the process outlined in last year's SPP/APR submission. In sum, certification forms were sent to the regions for each special education student on record aged 16 and above with an IEP and instructions were given to responsible personnel for the review and completion of the certifications. Teachers and school directors were asked to look over the IEP for their respective students, certify the form stating that the student's IEP includes such services, and send the certification back to the Central level.

From the number of the students identified in our data base system we were able to certify 58.33% as those having appropriate transition goals and services in their IEP. This is an increase of over 5% from last year. As discussed in last year's APR submission PRDE has been undergoing efforts for a new information system. In the meantime, the current process of certifying this data is extremely cumbersome. For example, it requires mailing certifications from the central level to the regions, from the

regions to the districts, the districts to the schools, and back again. This has contributed to making the collection of certifications extremely difficult. Although we have only been able to certify 58.33%, this is not to say that the remaining students do not have transition services included in their IEPs. Rather, we have been unable to certify this fact. Our hope is that the implementation of the information system will help streamline and make more efficient this process, thus eliminating such obstacles.

In reviewing the method in which PRDE reports on this indicator, it has been determined that the language in the certification form is not as specific as that asked for by the measurement definition. The certification reads as follows:

CERTIFICACIÓN TRANSICIÓN
2006-2007

CERTIFICO, que el estudiante _____ tiene en su Plan Educativo Individualizado (PEI) correspondiente al año 2006-2007 metas y servicios apropiados de transición.

Translated, this states:

TRANSITION CERTIFICATION
2006-2007

I CERTIFY, that the student, _____ has in his/her Individualized Education Plan (IEP) for the year 2006-2007 appropriate transition goals and services.

PRDE plans to evaluate and revise accordingly its data collection method for this indicator. Beyond concerns with the exact language used in the 2006-2007 certification form, PRDE had already been considering transitioning away from using a certification form such as this as its means for measuring this indicator. Rather, PRDE expects to transition its data collection method for this indicator from the current method (use of the certification form) to a method employing a transition checklist/questionnaire similar to methods used by many other states. PRDE will be working with SERRC to evaluate and revise accordingly its data collection method.

Activity	Progress	Slippage
1. Continue and intensify monitoring to guarantee the services in the IEP	Technical Assistance was provided by the Special Education General Supervisor for transition process to schools, especially to vocational and pre-vocational schools. Clarification on concepts, activities and other considerations attended by phone calls. Strong advice / training was provided to teachers working on transition process for students 16+ during monitoring visits, general trainings, and the new IEP template training.	N/A

<p>2. Coordination with governmental agencies to revise the interagency agreement in order to actualize transitions needs for the students</p>	<p>In October 2007, PRDE entered into a new Interagency Agreement with the Department of Labor's Vocational Rehabilitation Unit. This agreement establishes the transition processes between the two agencies.</p>	<p>N/A</p>
<p>3. Revise the Transition Manual</p>	<p>Following the signing of this agreement, the current transition manual was reviewed to identify areas that needed to be updated in order to revise the transition manual in accordance with the new Interagency Agreement.</p> <p>PRDE has completed this review and is in the process of making the corresponding revisions to the Transition Manual.</p>	<p>N/A</p>
<p>4. Teacher and administrative personnel training</p>	<p>Trainings were held island wide regarding the transition process and requirements. The trainings included teachers, general supervisors, and district supervisors.</p>	<p>N/A</p>
<p>5. Strengthen and intensify relations between rehabilitation and vocational programs in order to improve our services</p>	<p>The agencies have been working collaboratively through the year, and have held joint meetings periodically.</p>	<p>N/A</p>

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2007:

PRDE intends to continue with the same improvement activities for FFY 2007. One additional activity is proposed as follows.

Activity	Timeline	Resources
<p>Evaluate and revise accordingly PRDE's data collection method for this indicator. Transition from current data collection method (use of certification form, etc.) to questionnaire/checklist methods more commonly used by other states.</p>	<p>March 2008 - May 2008</p>	<p>SAEE staff and technical assistance from SERRC.</p>

Part B State Annual Performance Report (APR) for FFY 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: Effective General Supervision Part B / Effective Transition

Indicator 14: Percent of youth who had IEPs, are no longer in secondary school and who have been competitively employed, enrolled in some type of postsecondary school, or both, within one year of leaving high school.

(20 U.S.C. 1416(a)(3)(B))

Measurement: Percent = [(#of youth who had IEPs, are no longer in secondary school and who have been competitively employed, enrolled in some type of postsecondary school, or both, within one year of leaving high school) divided by the (# of youth assessed who had IEPs and are no longer in secondary school)] times 100.

Overview of Issue/Description of System or Process:

This is the first year for which Puerto Rico is required to submit baseline data, discussion of baseline data, targets, and improvement activities. Puerto Rico has adhered to its timeline of activities as set out in its prior SPP and APR submissions and as a result is able to provide the required data. Our baseline data, discussion, targets, and developed improvement activities are all listed below.

The measurement for this indicator requires using data for students who exited secondary school at the end of 2005-2006 school year and who were tracked over the 2006-2007 school year. Puerto Rico made the decision to use census data for this indicator, not a sample. To determine the data to be used for the denominator for this measurement (i.e., the number of students to be assessed), PRDE used data from Table 4 (“Report of Children with Disabilities Exiting Special Education During the 2005-2006 School Year”).

After identifying the population to be assessed, PRDE’s process is to track the status on being competitively employed, enrolled in some type of postsecondary school, or both, for each individual within this population. PRDE adopted and employed the following definitions for competitive employment and post secondary school in establishing the criteria for tracking the students and data collection:

Competitive Employment: work in the competitive labor market that is performed on a fulltime or part time basis in an integrated setting for which an individual is compensated at or above the minimum wage, but not less than the customary wage and the level of benefits paid by the employer for the same or similar work performed by the individual who are not disabled.

Postsecondary school: a University or College (4 year program), Community or Technical College (2 year program), Vocational or Technical School, (2 year program).

The identified students are then classified by schools, school districts and regions. PRDE’s survey for the data collection was designed using the National Post School Data Outcomes Center (Oregon University): Post School Data Collection Protocol. SERRC provided technical assistance on the procedures and steps required.

In February 2007, prior to issuing the survey, PRDE conducted activities to validate the survey. Validation activities took place in the San Juan Region with 24 special education students who exited

services during 2005-2006. They were identified and contacted to complete the survey. The analyses of the document reflected no need for changes to the document. Information needed was provided as requested on the survey.

After survey validation an island wide meeting took place in October 2007 with social workers to discuss transition services and instructions for the task required. The corresponding student lists and surveys were distributed. The social workers who attended the meeting were responsible for tracking the students. These efforts included phone calls, home visits and other collaboration as needed such as visits to work and study sites, among others. The survey was conducted by phone. Information was provided by both parents and students.

By the end of October 2007 PRDE completed the survey information collection and results were sent to the PRDE SAEE central office where data was analyzed.

Baseline Data for FFY 2006 (2006-2007): 91.33%

# of Youth Assessed (total = 807)			Neither competitively employed nor studying	Not located	# of Youth Attempted to be Assessed who had IEPs and are no Longer in Secondary School
Surveys demonstrated competitive employment, enrolled in some type of postsecondary school, or both (total = 737)					
Studying	Working	Both			
338	200	199	70	454	1261

# of youth who had IEPs, are no longer in secondary school and who have been competitively employed, enrolled in some type of postsecondary school, or both, within one year of leaving high school	(DIVIDED BY) # of youth assessed who had IEPs and are no longer in secondary school	(EQUALS) Measurement for Indicator 13 / Baseline Data
737	807	91.33%

Discussion of Baseline Data:

The percentage of youth assessed who had IEPs and are no longer in secondary school that have been competitively employed, enrolled in some type of postsecondary school, or both, within one year of leaving high school was 91.33%.

Once concern is that PRDE was able to locate and assess only about two-thirds of the students it attempted to assess for this submission. Puerto Rico will work to identify the reasons for this and improve the percentage of exiting students that it is able to locate and assess for the next submission.

It is also important to note that in identifying the students to include in its survey/assessment, Puerto Rico made an error in not including all youth who had IEPs and are no longer in secondary school in the universe of students to be assessed. Instead, Puerto Rico identified only youth who had IEPs who were no longer in secondary school by way of graduations.

Puerto Rico recognizes that in employing the census method, the total population of students to be assessed under this indicator should include the total number of students who exited secondary school from the following basis of exit categories from Table 4: (i) graduated with a regular high school diploma, (ii) received a certificate, (iii) reached maximum age, or (iv) dropped out of school. Students who exited special education due to the other Table 4 basis of exit categories (transferred to regular education, died, or moved (off of the island) known to be continuing) would not be included in the assessment for logical reasons (have not left high school, or have passed away, etc.).

Puerto Rico therefore erred by working with only one of the Table 4 bases of exit subgroups instead of the four subgroups it should have included. Puerto Rico inadvertently included only students with IEPs who exited post secondary school due to graduating with a high school diploma in its census. Looking back to the Table 4 data for 2005-2006, the total population of students that should have been included in the survey/assessment for this indicator is as follows:

High School Diploma	Received Certificate	Reached Maximum Age	Dropped Out	TOTAL
1261	253	78	668	2260

As such, the total population of youth Puerto Rico should have sought to survey/assess would have been 2260 instead of 1261.

Due to this oversight, Puerto Rico expects to revise its SPP and submit new baseline and target data in its FY 2008 APR for Indicator 14. Including the additional subgroups of students (students who exited due to receiving a certificate, reaching maximum age, or dropping out) in the denominator may have a significant impact on the results. As such, PRDE recognizes it may need to adjust the baseline and corresponding targets to take account for the oversight discussed above. Accordingly, the proposed improvement activities include correcting for this oversight to ensure a more accurate baseline for FY 2008.

Measureable and Rigorous Target:

FFY	Measureable and Rigorous Target
<i>2007 (2007-2008)</i>	<i>91.33%</i>
<i>2008 (2008-2009)</i>	<i>91.5%</i>

<i>2009 (2009-2010)</i>	<i>91.7%</i>
<i>2010 (2010-2011)</i>	<i>91.85%</i>

Improvement Activities/Timelines/Resources:

Activity	Timeline	Resources
1. Revise survey document to include all exiting students based on 618 data.	March 2008	Special Education General Supervisors (Central Level)
2. Increase professional development on selected topics in secondary transition.	Continuously , following receipt of Technical Assistance	Special Education General Supervisors (Central Level)
3. Update or develop plans to improve secondary transition education and services and capacity implement.	March 2008 – April 2008	Special Education General Supervisors (Central Level)
4. Identify additional technical assistance for student outcomes improvement and activities for student retention.	Technical Assistance is to begin March 2008	Special Education General Supervisors (Central Level) DAC SERRC

Part B State Annual Performance Report (APR) for FFY 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: Effective General Supervision Part B / General Supervision

Indicator 15: General supervision system (including monitoring, complaints, hearings, etc.) identifies and corrects noncompliance as soon as possible but in no case later than one year from identification.

(20 U.S.C. 1416 (a)(3)(B))

Measurement:
 Percent of noncompliance corrected within one year of identification:

- a. # of findings of noncompliance.
- b. # of corrections completed as soon as possible but in no case later than one year from identification.

Percent = [(b) divided by (a)] times 100.

For any noncompliance not corrected within one year of identification, describe what actions, including technical assistance and enforcement actions that the State has taken.

FFY	Measurable and Rigorous Target
2006	100%

Actual Target Data for FFY 2006: 71.88%

Data:

Entity Monitored	TOTAL # of Findings	CLOSED		PENDING	
		Within 1 year	Beyond 1 Year	Still within 1 year	Beyond 1 year
Arecibo Region	10	1	0	9	0
Bayamon Region	11	2	0	0	9
Caguas Region	10	10	0	0	0
Humacao Region	10	10	0	0	0
Mayagüez Region	6	0	0	6	0
San Juan Region	1	0	0	1	0
TOTAL	48	23	0	16	9

Measurement:

In order to account for findings that are still pending for which PRDE still has an opportunity to be able to close within a year of their opening (i.e., findings from post February 1, 2007 that are not yet closed), in calculating the measurement for our target data, we remove those findings from the denominator. Accordingly, data for measurement ‘a’ (the denominator for this measurement) is 32 (48-16).

A. # of finding of non compliance (priority areas)	B. # of corrections within one year	%
32	23	71.88%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006):

Background and Approach

During the past year, PRDE has begun taking a critical look at its monitoring and general supervision system and as a result has begun taking steps toward re-envisioning and revamping its monitoring unit. Through conversations with OSEP, Puerto Rico came to realize it had not been reporting data under this indicator in the manner preferred by OSEP. In order to explain this difference, it is important to provide some background to the structure/hierarchy of Puerto Rico’s educational system.

As a unitary system, PRDE serves as both the SEA and the LEA. PRDE divides the island in to seven educational regional units: Arecibo, Bayamón, Caguas, Humacao, Mayaguez, Ponce, and San Juan. Within these seven regions fall a total of 84 school districts, and a total of 1500 schools. PRDE’s monitoring unit has for at least the past several years always monitored a variety of both schools and school districts every year. Each year, in addition to new initial monitoring visits/cases that PRDE would open, it would continue with follow up visits to all sites (schools and school districts) with any findings of non compliance that remained pending. In the APR, Puerto Rico reported the total number of findings for the given fiscal year by totaling each finding from initial visits at all schools and school districts each year. In other words, Puerto Rico was treating every single school unit and school district unit as separate entities for purposes of Indicator 15.

During OSEP’s verification visit to Puerto Rico in November 2007, OSEP representatives explained to Puerto Rico that individual schools should not be considered the entity monitored for purposes of indicator 15 and moreover that once Puerto Rico defined its entity, that findings for the same item of non compliance at different units (i.e., schools and school districts) within that entity should count as only one finding.

This year, Puerto Rico is reporting its data under Indicator 15 in a manner in accordance with OSEP’s request. In the past, however, Puerto Rico presented the data treating each school or school district as the entity and counting every single finding, regardless of repetition of finding in the same substantive area. Due to the manual nature of PRDE’s monitoring unit files and data as well as the reorganization of PRDE’s regional system during the winter of 2006, to reorganize the indicator 15 data from previous SPP and APR submissions is impossible at this moment. Going forward, Puerto Rico plans to continue its reporting under this indicator in the manner presented this year. Additionally, as PRDE moves forward with the reworking of its monitoring system, PRDE intends to take the SPP/APR indicators in serious consideration as it develops the manner in which it will collect and organize monitoring data. Over the past year, PRDE has requested SERRC’s and DAC’s assistance in this re-envisioning and revamping, has received their assistance in preparing this submission, and looks forward to working with them over the coming year as PRDE works to strengthen the foundation of its monitoring and general supervision system.

Summary of Monitoring Unit Efforts during FFY 2006-2007

During FFY 2006-2007, PRDE’s Monitoring Unit conducted initial visits to schools and districts across six of Puerto Rico’s seven regions. From these visits, the PRDE Monitoring Unit identified findings

in the following twelve areas: Child Find, Eligibility Determination, IEP, Triennial Re-evaluation, Confidentiality, Least Restrictive Environment, Procedural Safeguards, Use of Funds, Continuous Monitoring, CPSD, Transportation, and Performance Indicators.

Each region that was monitored was identified with findings in at least one of these areas. It should be noted that monitoring within the San Juan Region was focused monitoring this year on IEPs. This may help explain why that region had only one finding where the other regions had at least six findings and some as many as eleven.

The following table is similar to the reporting method OSEP has requested by Indicator or indicator cluster. However, as was noted above PRDE has collected and organized data in the past by areas of finding or substantive areas. As such, the following chart outlines by substantive area of finding in how many entities (regions) monitored the finding was identified, how many have been corrected within one year, and how many remain pending. This chart serves as PRDE's Worksheet B-15-like chart.

Finding Area	# of Programs Monitored	(a) # of Findings of noncompliance identified in FFY 2006	# of findings from (a) for which correction was verified no later than one year from identification	Findings Pending	
				< 1 year	>1 year
1. Elig. Determination	5	5	2	2	1
2. Triennial Re-evaluation	5	5	2	2	1
3. Use of Funds	5	4	3	1	0
4. IEP	6	6	2	2	2
5. Transportation	5	4	3	0	1
6. Performance Indicators	5	3	2	1	0
7. Continuous Monitoring	5	5	2	2	1
8. Child Find	5	3	1	1	1
9. Procedural Safeguards	5	4	1	2	1
10. Confidentiality	5	3	2	0	1
11. CPSD	5	1	1	0	0
12. Least Restrictive Environment	5	5	2	2	1
TOTAL	6	48	23	15	10

In addition to initial monitoring visits within these six entities (regions), the monitoring unit conducted a very significant number of follow up visits to open locations with open monitoring findings from past years. Information on closure of entities with outstanding monitoring findings is included in the Report on Correction on Noncompliance submitted simultaneously with this APR. The monitoring unit also oversaw training on compliance, sanction system, and special education procedures.

Additional Reporting Requests

In the APR Determination Letter and the accompanying Part B SPP/APR Response Table sent to PRDE in June 2007, OSEP asked Puerto Rico to report on several additional items, including (i) the status of the remaining 11 agencies with longstanding noncompliance issues, (ii) the status of correction of assistive technology noncompliance, and (iii) disaggregated data for initial evaluations and reevaluations. Each of these items was previously reported on in the Long-term Noncompliance Report submitted simultaneously with Puerto Rico’s APR FFY 2005 APR. This year, these items are again reported on simultaneously with Puerto Rico’s APR submission, in the Correction of Non-Compliance Report. Please refer to the Correction of Non-Compliance Report for Puerto Rico’s responses to these items.

Improvement Activities/Timelines/Resources:

Activity	Progress	Slippage
1. Review and revise the monitoring system to include aspects identified as per the SPP	Ongoing technical assistance with SERRC and DAC.	
2. Send close out letters to entities which evidenced correction of 100% of noncompliance findings	Done with every closure.	
3- Send notifications letters to entities with repeated non-compliance findings with one year of identification. These letters will identify the level of sanctions and the enforcement activities that will be carried out.	Done continuously.	
4- Continue to implement the monitoring cycles to entities providing special education services	Continuous.	
5- Incorporate compliance component as part of the Statewide Personnel Development System	Ongoing through technical assistance with SERRC and DAC.	
6- Incorporate the use of the data from the special education information system, as part of the monitoring efforts	Ongoing through technical assistance with SERRC and DAC.	
7- Train and provide technical assistance regarding compliance to the educational system	Ongoing. Will also be further enhanced via technical assistance with SERRC and DAC.	

8- Intensify training and support to regional monitors	Ongoing. Will also be further enhanced via technical assistance with SERRC and DAC.	
9- Recruiting of two additional monitors for Mayaguez and San German Regions	Recruitment efforts continue.	
10- Conduct focus monitoring activities to evaluate compliance with the following indicators and compliance areas: alternate assessment, provision of related services, transition from C to B, adult transition, initial evaluations and eligibility determination, reevaluations, and mediation process.	Ongoing through technical assistance with SERRC and DAC.	
11- Continue to implement the monitoring cycles to entities providing special education services	Ongoing through technical assistance with SERRC and DAC.	

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2006:

As discussed, PRDE is looking forward to working with SERRC and DAC as technical assistance providers as it works to re-envision and revamp its monitoring unit and general supervision system. This will be an immense undertaking. SERRC has begun to provide PRDE with documents regarding other SEA's monitoring system. A joint meeting will be held in March 2008 to formalize the joint technical assistance endeavor with PRDE, SERRC, and DAC. Until that point, it is hard to identify specific improvement activities. This will be one of PRDE's top focuses over the next year.

Part B State Annual Performance Report (APR) for FFY 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: Effective General Supervision Part B / General Supervision

Indicator 16: Percent of signed written complaints with reports issued that were resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint.

(20 U.S.C. 1416(a)(3)(B))

Measurement: Percent = [(1.1(b) + 1.1(c)) divided by 1.1] times 100.

FFY	Measurable and Rigorous Target
2006	100%

Actual Target Data for FFY 2006: 56.04%

Data from Table 7 (FFY 2006):

- (1) # of written, signed complaints received (total): 102
 - (1.1) # of complaints with reports issued: 91
 - (a) # of reports with findings: 57
 - (b) # of reports within timeline: 50
 - (c) # of reports within extended timeline: 1
 - (1.2) Complaints withdrawn or dismissed: 11
 - (1.3) Complaints pending: 0
 - (a) # of complaints pending a due process hearing: 0

FFY 2006 Measurement:

Data Year	1.1(b)	1.1(c)	1.1
2006-2007	50	1	91

Data Year	1.1(b) + 1.1(c)	Divided by 1.1	Times 100	= Percent
2005-2006	51	0.56044	56.044	56.04%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

PRDE has made tremendous progress over the past year and a half regarding the 60-day timeline for the state complaint process. Although only 56 percent of signed written complaints were resolved within the established timeline, this is dramatic improvement from last year's data for this indicator (2.78%). This upward trend of progress is further illustrated in PRDE's Special Conditions Report filed simultaneously with this APR submission reporting that 84.62% of all state complaints filed

between July 1, 2007 and November 30, 2007 were resolved within the established timeline. PRDE's progress is due to a variety of factors such as revision of procedures and internal oversight of this process, as discussed in previous special condition reports submitted by PRDE to OSEP.

There are a number of reasons why PRDE was not able to make the 100 percent target for FY 2006. First, PRDE entered FFY 2006 with a special condition on its grant award regarding non-compliance with state complaint process timelines that required PRDE to focus on not only ensuring timeliness of incoming complaints but also eliminating a significant backlog of state complaints that were still pending. For example, PRDE had 117 pending complaints that had been filed prior to March 1, 2006. The special condition required PRDE to eliminate this backlog of complaints in full by April 30, 2007. PRDE successfully complied with this requirement. Similarly, the special condition required PRDE to issue timely decisions in at least 50% of the state complaints filed between March 1, 2006 and November 30, 2006. Again, PRDE was able to comply with this special condition. Concentrating on addressing these two special condition categories required a great amount of resources from PRDE, preventing PRDE from being able to focus entirely on the timeliness of incoming FFY 2006 complaints.

Second, the amount of state complaints filed during FFY 2006 increased nearly threefold up from 37 to 102. This increase is believed to be due in large part to an increased or renewed faith in the state complaint process. Furthermore, PRDE provided presentations island-wide regarding the state complaint process and IDEA regulations to all special education teachers. As a result of increased publicity, teachers were able to make parents more aware of the process, likely leading to increased use of the process as well. Even with increased resources focused on PRDE's state complaint process, the unexpected and dramatic increase in the filing of state complaints was incredibly difficult for PRDE to keep up with.

Other factors affecting PRDE's ability to fully comply with the timeliness requirement include shortage of human resources, which has been further challenged by the government of Puerto Rico's fiscal crisis, as well as implications related to complying with the Rosa Lydia Velez consent decree and related orders. PRDE is working to address such staffing shortage issues, a significant obstacle. In an effort to address such needs, PRDE is currently in the recruitment process for a second state complaint investigator.

Beyond the timeliness factor, it is important to note that PRDE has no pending FFY 2006 state complaints. In fact, as reported in PRDE's Special Conditions Report filed simultaneously with this APR report, PRDE has no pending FFY 2007 for state complaints filed through November 30, 2007. This means that PRDE has no backlog or pending complaints that have exceeded timelines whatsoever. PRDE has certainly fixed its past problem with complaints, and now with the backlog gone and additional resources being added from the Secretary in the form of an additional investigator (recruitment for this position is currently ongoing). PRDE looks forward to continually improving and hitting its 100% target for this indicator in coming years.

In addition to the progress with the improvement activities discussed in the chart below, PRDE is involved in the

Activity	Progress	Slippage
1. Data input to the new electronic information system for complaints.	Data system is operating efficiently. There have not been any problems with efficient and regular data input.	N/A
2. Validation checks of information system to ensure all complaints are being recorded.	Analysis of the state complaints files and the information system is made to ensure all complaints are registered.	N/A

	<p>Additionally, on November 20, 2007, an individual was designated to be responsible for overseeing the tracking of state complaints. This individual assists with collection of data for the APR and Special Condition Reports. This individual handles these validation checks.</p>	
<p>3. Monitor timeline of all pending complaints and determine if further action need be taken (i.e., communication with investigator or assigned lawyer to determine why any delay in progress, etc.).</p>	<p>PRDE complied with this activity. A weekly monitoring process is performed to oversee the status of all pending complaints. A weekly alert regarding the time left to resolve each complaint within the 60 day timeline is established for the Complaint Investigator, the assigned lawyer on the complaint, the Special Education Legal Division (SELD) Director, and the individual designated to track the process.</p>	N/A
<p>4. Task force meetings to discuss progress and needs.</p>	<p>PRDE complied with this activity. Monthly meetings were held to aid in overseeing the progress of the complaints, to discuss all situations affecting the resolution process, and to discuss administrative actions necessary to resolve particular situations.</p>	N/A
<p>5. Establish a new manual filing system for the hard copies of the complaints.</p>	<p>A review of the hard copies of all files was made and compared with the electronic system to validate accuracy and completeness of the electronic system.</p> <p>Also, all complaints are now filed together separately from any other documentation in the office. The only personnel with access to these files are the State Complaint Investigator, the individual designated to keep track of the complaints, and the Special Education Legal Director.</p>	N/A
<p>6. Hold additional training sessions for lawyers and investigators regarding the complaint process.</p>	<p>Such trainings were held, as were trainings on this process for all special education teachers island wide.</p> <p>Also, our state complaints investigator attends training on</p>	N/A

	<p>investigation techniques, communication, and mediation and negotiation techniques.</p> <p>A training on state complaint management, special education services, and working with parents is planned to be held during February 2008 for the investigators of the administrative complaint investigation office of the legal division.</p>	
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Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY2006:

PRDE will continue to expand training for investigators, lawyers and other personnel related to the state complaint process and to continue the upward progress toward meeting the 100% target. PRDE will also continue to monitor the timeline of pending complaints, make validation checks of information systems.

In addition to current improvement activities, PRDE plans also to:

ACTIVITY	TIMELINE	RESOURCES
<p>1. Review and improve as appropriate the state complaint filing process, to include designing and incorporating a new model complaint form and expanding the sites wherein a state complaint can be filed.</p>	<p>March, 2008-June 2008</p>	<p>SELD Administrative Complaint Investigation Office of the Legal Division</p>
<p>2. Evaluate resources and seek to hire new personnel to work with the state complaint process as determined appropriate (likely an additional investigator and an additional lawyer).</p>	<p>February, 2008</p>	<p>SELD</p>

Part B State Annual Performance Report (APR) for FFY 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: Effective General Supervision Part B / General Supervision

Indicator 17: Percent of fully adjudicated due process hearing requests that were fully adjudicated within the 45-day timeline or a timeline that is properly extended by the hearing officer at the request of either party.

(20 U.S.C. 1416(a)(3)(B))

Measurement: Percent = [(3.2(a) + 3.2(b)) divided by 3.2] times 100.

FFY	Measurable and Rigorous Target
2006	100%

Actual Target Data for FFY 2006: 51.46%

Data from Table 7 (FFY 2006):

Data Year	3.2—Hearings (fully adjudicated)	3.2(a)—Decisions within timeline	3.2(b)—Decisions within appropriately extended timeline
2006-2006	1271	654	0

FFY 2006 Measurement:

Data Year	3.2(a) + 3.2(b)	3.2	[3.2(a) + 3.2(b)] / 3.2	Times 100	= Percent
2006-2007	654	1271	0.51455	51.455	51.46%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

Although PRDE did not meet the mandatory 100% target, PRDE worked hard to improve its performance and accurate reporting regarding the management of due process timelines. Over the past year PRDE has carried out series of activities including trainings for the administrative judges on the law as well as periodic meetings wherein compliance with the due process timeline was emphasized.

PRDE implemented several significant improvement activities in order to ensure accurate and reliable data. One important improvement activity, still in progress, has been taking a serious look at

PRDE's policies for classifying a due process timeline as having been appropriately extended. In last year's APR submission, PRDE reported 208 due process decisions with appropriately extended timelines. In analyzing cases file by file using a verification sheet checklist, PRDE determined that best practices were not in place for properly determining whether extensions were appropriately made and documented. PRDE immediately clarified the requirements for appropriate extensions of timelines for due process decisions, held a meeting to train administrative judges on these requirements, and made the conservative decision to not consider a single timeline extension during FFY 2006-2007 as having been extended appropriately.

PRDE recognizes that this decision may hurt the appearance of its compliance with this indicator, however in order to ensure accurate data and full compliance with requirements of appropriate time extensions, PRDE believes this is the correct choice for going forward. While PRDE's data from the FFY 2005 APR reported 66.6%, if PRDE had employed this strict approach last year, and not included any of the 208 decisions reported as made with extended timelines, last year's data for this indicator would have been only 49.88% (608/1219). Making this more similar comparison with this year's data, PRDE has increased its improvement from 49.88% to 51.46%.

Having used this year to help strengthen the foundation of PRDE's procedures and management of data for this indicator, PRDE looks forward to coming closer to its target in the FFY 2007 APR.

The following chart provides information on the accomplishments, progress and slippages, with its improvement activities for this indicator. Additional activities to help bring PRDE to 100% compliance with this indicator are provided in a subsequent chart as well.

Activity	Progress	Slippages
<p>1. Include due process procedures as part of the Statewide Personnel Development System to ensure personnel's understanding and implementation of adequate processes.</p>	<p>PRDE SAAE has offered several due process complaint procedure trainings as part of the incorporation of the resolution meetings to ensure personnel has a clear understanding of the processes provided by IDEA to solve controversies, specifically State Complaints, Mediation, and due process complaints. PRDE has made a clear effort to clarify the proper management of due process complaints at all levels, from clerical personnel to lawyers and ALJ's.</p>	<p>N/A</p>
<p>2. Request administrative judges to make an explanation of the reasons for resolutions being issued after 45 days timeline.</p>	<p>A meeting was held with all ALJs on October 2, 2007 and a legal memo analyzing IDEA's requirement regarding the timeline was distributed. The ALJs discussed among themselves ways of fulfilling this requirement and agreed to include in writing the timeline extension requested in the following orders and</p>	

	<p>resolutions.</p> <p>In RLV the plaintiffs and Commissioner are concerned about the ALJs lack of responsibility regarding this legal requirement. This is an aspect that is being continually monitored in this case as well.</p> <p>On February 14, 2008 an administrative hearing will be held with both parties in RLV to develop additional strategies to approach this challenge.</p>	
<p>3. Continue to inform administrative judges on due process requests that are near the 45 days timeline expiration.</p>	<p>PRDE had confronted difficulties identifying the due process requests that are near the 45 days timeline extension. This obstacle has been due to both the high volume of due process complaints filed and the need to develop an accurate system to identify them.</p>	<p>By February 2008 PRDE expects to implement a computerized warning system that will offer an alert as the 45 day limit approaches.</p>
<p>4. Continue periodic training, continuing education, for administrative law judges.</p>	<p>Training was held for administrative judges and mediators in January and May 2007.</p>	<p>N/A</p>
<p>5. Encourage and publicize resolution session option to complainants.</p>	<p>PRDE participated in radio and television programs to promote the resolution process. Additionally, this information was disseminated to teachers and parents at PRDE SAEF activities.</p>	<p>N/A</p>

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2007-2008

In addition to current improvement activities, PRDE proposes the following additional improvement activities for FFY 2007.

Activity	Timeline	Resources
<p>1. Re-train personnel on the due process procedures including the newly incorporated Resolution Meeting processes.</p>	<p>November 2007-January 2008</p>	<p>PRDE Special Education Secretarial Unit, PRDE Special Education Provisional Remedies Unit</p>

<p>2. Review and amend contracts to be used with the administrative judges to specifically include compliance with timeline requirements.</p>	<p>July 2008</p>	<p>PRDE Special Education Secretarial Unit, PRDE Special Education Provisional Remedies Unit</p>
<p>3. Include in the information system a system for issuing alerts identifying due process cases that are approaching the end of their timelines.</p>	<p>February 2008</p>	<p>PRDE Special Education Secretarial Unit, PRDE Special Education Provisional Remedies Unit</p>
<p>4. Conduct a needs study to determine training area needs for administrative judges.</p>	<p>September 2007</p>	<p>PRDE Special Education Secretarial Unit, PRDE Special Education Provisional Remedies Unit</p>
<p>5. Train administrative judges on the requirements for proper time extensions for the 45 day timeline, along with other topics, in accordance with the needs study discussed above.</p>	<p>February – May 2008</p>	<p>PRDE Special Education Secretarial Unit, PRDE Special Education Provisional Remedies Unit</p>

Part B State Annual Performance Report (APR) for FFY 2006

Overview of the Annual Performance Report Development:

<p>Monitoring Priority: Effective General Supervision Part B / General Supervision</p>

Indicator 18: Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements.

<p>Measurement: Percent = (3.1(a) divided by 3.1) times 100</p>
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Overview of Issue/Description of System or Process:

As explained in the FFY 2005 APR, PRDE was still in the process of implementing the resolution session process into its due process procedures one year ago. Since then, PRDE has implemented resolution sessions into the due process procedures, effective May 23, 2007. The first resolution session was held shortly thereafter. In order to implement the resolution process, PRDE was required to consult with the Rosa Lydia Velez (RLV) plaintiffs class as all changes or new incorporations to policies, processes, and procedures affecting services to children with disabilities and their rights must be discussed with the class for consent or approval under the RLV consent decree. This requirement was explained to and discussed with OSEP representatives during our verification visit in November 2007. While there was initially great controversy with the class, after roundtable meetings with parent representatives, PRDE was able to incorporate resolution meetings in accordance with IDEA 2004 and the corresponding federal regulations. Although controversy with the class regarding the resolution process remains, PRDE continues to discuss its resolution meeting process and its implementation thereof with the RLV class in RLV-related administrative hearings.

In preparing to implement the resolution meeting process, PRDE SAAE trained its general supervisors, district supervisors, attorneys, hearing officers, and leadership from parents' organizations on the resolution meeting procedures and process. Recently, PRDE also trained special education teachers around the Island about the resolution meeting process and procedures as well.

Prior to implementation, personnel to be charged with implementation and oversight of the resolution process were recruited and appointed. A Coordinator of Resolution Meetings was appointed at the Central Level to serve as the coordinator and monitor the implementation of the process. The Coordinator of Resolution Meetings oversees PRDE personnel in charge of coordinating the resolution meetings at the regional level. These individuals were appointed in the past year and placed in seven of the Special Education Service Centers across the island to handle resolution meetings in the seven PRDE educational regions. The number of employees assigned to these positions in each region was determined based on the volume of due process complaints filed in each region. These employees are charged with investigating the allegations of the due process complaints going to resolution session and coordinating the resolution meetings. Their official title within the PRDE system is "Investigador Docente." Herein we will refer to them as the resolution meeting investigators/facilitators. These employees were trained in resolution meetings, disciplinary procedures, and dispute resolution strategies. They continue to receive training on the resolution process to ensure it is effective in reaching agreements between the parties and maintaining parent satisfaction. PRDE central staff also holds periodical meetings with them to monitor the process and make adjustments that are proven to be necessary.

The following table reflects the number of resolution meeting investigators/facilitators in PRDE per region:

REGION	INVESTIGATORS/FACILITATORS
Caguas	2
San Juan	2*
Bayamón	3
Humacao	1
Ponce	1
Arecibo	1
Mayaguez	1

*There is still one vacant position that PRDE is actively recruiting for this region but it has encountered challenges in the recruitment process.

Baseline Data for FFY 2006 (2006-2007): 50%

Data Year	3.1(a), Settlement Agreements	3.1, Resolution Sessions Held	3.1(a) Divided by 3.1	= Percent
2006-2007	12	24	0.50	50%

Discussion of Baseline Data:

From the date of the implementation of resolution meetings until the end of the fiscal year (5/23/07-6/30-07), PRDE held a total of 24 resolution meetings. Of these 24 meetings, twelve reached total agreement, 5 reached partial agreements, and 7 did not reach agreement. This data was retrieved from the Due Process Unit’s data collection base.

Because over ten resolution meetings were held in 2006-2007, PRDE is now required to use this baseline data to establish measureable and rigorous targets for the SPP. As resolution meetings were only held during a limited period of FFY 2006, it is difficult to predict if the result of resolution meetings held throughout an entire fiscal year will produce the same results. If the data during FFY 2007 yields significantly different results, PRDE will evaluate reasons for such cause and reserves the right to adjust its baseline and corresponding targets accordingly.

FFY	Measurable and Rigorous Target
2007 (2007-2008)	50.3%
2008 (2008-2009)	50.7%
2009 (2009-2010)	51%
2010 (2010-2011)	51.5%

Improvement Activities/Timelines/Resources:

As this is the first year for PRDE reporting baseline data under this indicator, PRDE is now required to list also its improvement activities/timelines/resources. Because PRDE included improvement activities for this indicator with its past APR submission, however, PRDE herein first reports the progress and slippage during FFY 2006 with the improvement activities listed in the FFY 2005 APR, and then lists the improvement activities/timelines/resources going forward.

Progress and Slippage for FFY 2006 with the Improvement Activities listed in the FFY 2005 APR:

Activities	Progress	Slippage
<p>1-Develop the official process</p> <ul style="list-style-type: none"> a- Review the current due process procedures and identify areas to revise /modify / include discussion of resolution sessions. b- Draft the new procedures. c- Design related forms. d- Design tracking methods to include tracking effectiveness. 	<ul style="list-style-type: none"> a- PRDE assigned a Task force to review the current process and identify the changes it needed to make to incorporate the resolution meetings. b- By May 2, 2007 PRDE had a draft of the amended internal procedures for the due process complaints management. c- PRDE reviewed the model form to be used for filing a due process complaint to adjust it to include the resolution meeting process. Although PRDE has already begun using this form, it continues to be a topic of discussion with the RLV case. Some changes may be made in accordance with the ongoing discussions. <p>PRDE also designed detailed forms to guarantee the effectiveness and accuracy of the resolution meetings legal procedure. Among those forms are: (i) resolution meeting appointment forms, (ii) total agreement form, (iii) no agreement form, (iv) partial agreement form, (v) timeline extension form, (vi) confidentiality agreement form.</p> <ul style="list-style-type: none"> d- PRDE designed a computer tracking system to monitor the resolution meetings and safeguard the timelines established in the law. This program is run by the Secretarial Unit. 	<p>N/A</p>
<p>2-Submit the amended process to the concerned parties (including the RLV class plaintiffs) for discussion and feedback</p>	<p>During 2007, PRDE held several meetings with RLV Parents' Committee and the main parents' associations in Puerto Rico. In a meeting held May 18, PRDE trained the parents about the IDEA amendment regarding resolution meetings, presented the draft procedures and forms, and received and incorporated the feedback of the parents into the process. In later meetings, PRDE continued to receive feedback.</p>	<p>N/A</p>
<p>3- Design and provide training for relevant personnel (including</p>	<p>PRDE has trained the relevant personnel, including the investigators/facilitators that coordinate the meetings, as well as hearing officers, mediators,</p>	<p>N/A</p>

<p>process and best practices)</p>	<p>general supervisors, attorneys, and clerical personnel. These trainings have been held on: May 7, 2007 May 10, 2007 May 14, 2007 May 18, 2007 May 22, 2007 May 23, 2007 May 25, 2007 May 30, 2007 June 1, 2007 June 5, 2007 June 28, 2007</p> <p>During the current fiscal year (FFY 2007), PRDE has continued to offer trainings to personnel and have also trained special education teachers around the Island on these topics.</p>	
<p>4- Announcement to Parents and the Community regarding the changes and initial date of implementation.</p>	<p>A radio program was aired through Radio Isla local radio station to address this new process on May 22, 2007.</p> <p>A letter signed by SAEE Miriam Merced was sent to all main leaders from the special education parents' associations talking about the new process and inviting them to the meetings and to actively participate in them. A draft of the procedures was included with this letter as was a copy of the amended due process model form.</p>	<p>N/A</p>
<p>5- Implementation date of resolution sessions.</p>	<p>The resolution meetings were incorporated to PRDE's due process complaint process effective May 23, 2007.</p>	<p>PRDE had hoped to implement the process in April 2007, but it did not happen until May 2007.</p>
<p>6- Monitor the implementation of the process</p>	<p>The Coordinator of Resolution Meetings appointed at the Central Level has been working arduously with the Secretarial Unit and the Special Education Legal Division Director to monitor the implementation of the process. Periodical meetings have been held with the investigators/facilitators assigned throughout the Island to make sure the process is working as expected. Several changes have been made to the forms and new forms have been developed to aid in the process. The computer system designed for this effort has been an excellent tool for PRDE in keeping track of the due process complaints.</p>	<p>N/A</p>

Improvement Activities/Timelines/Resources Going Forward:

Activity	Timeline	Resources
1. Visits to the CSEE to monitor the implementation of the meetings and supervise the work of the investigators.	Periodical.	Hilda Teresita Sierra, Coordinator of Resolution Meetings
2. Meetings with the resolution meetings investigators/facilitators to review any challenges they are facing and clarify doubts about the process and their responsibility.	Periodical	Hilda Teresita Sierra, Coordinator of Resolution Meetings Special Education Legal Division Director
3. Monitor and ensure timeliness of resolution sessions to include tracking timelines through the designed computer system.	Continuous	Secretarial Unit
4. Continue to design and provide trainings to the investigators/facilitators to further train them in dispute resolution and conflict management.	1 additional training by May 2008	Hilda Teresita Sierra, Coordinator of Resolution Meetings PRDE SAEE
5. Continue to design and provide training to all other relevant personnel (including process, forms, best practices, etc.).	Periodic	Secretarial Unit Director, Special Education Legal Division Director
6. Recruit the last investigator assigned to San Juan.	As soon as a qualified candidate is identified, extended an offer, and agrees to take the position. Recruitment efforts have been ongoing.	Human Resources
7. Offer training to all the Special Education teachers around the Island.	It has already been done since November 2007. However, Arecibo's region training was cancelled due to the weather and is going to be rescheduled this semester.	PRDE SAEE

Part B State Annual Performance Report (APR) for FFY 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: Effective General Supervision Part B / General Supervision

Indicator 19: Percent of mediations held that resulted in mediation agreements.

(20 U.S.C. 1416(a)(3)(B))

Measurement:

Percent = [(2.1(a)(i) + 2.1(b)(i)) divided by 2.1] times 100.

FFY	Measurable and Rigorous Target
2006	61

Actual Target Data for FFY 2006: 57.9%

Data from Attachment I Used for Measurement

Data Year	2.1(a)(i) – Agreements Reached in Mediations Related to Due Process	2.1(b)(i) – Agreements Reached in Other Mediations (not Related to Due Process)	2.1 – Total Number of Mediations
2005-2006	225	28	437

Measurement

Data Year	2.1(a)(i) + 2.1(b)(i)	Divided by 2.1	Multiplied by 100	Percentage/Measurement
2005-2006	253	0.5789	57.9	<u>57.9%</u>

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

PRDE has in place procedures to resolve special education services controversies through mediation. PRDE’s mediation procedures allow parents and the agency to resolve a controversy with the intervention of an impartial mediator, on a voluntarily basis. In Puerto Rico, mediation can be requested as part of a due process request or by itself, outside of the filing of a due process complaint. Both alternatives require the identification of a mediator and scheduling mediation meetings in a timely manner.

When mediation is requested as part of a due process request, the process is overseen by the Secretarial Unit. The mediation option is included on the model due process complaint form. When a party enters the mediation process in this manner, the secretarial unit receives the mediation request and enters the data into a database to keep track of the process. Once the mediation meetings have occurred, the mediator informs the Secretarial Unit of the results of the meetings, and the Administrative Judge is informed in order to continue with the due process procedures accordingly. Mediation procedures under this alternative must take place within the due process timelines. If an agreement is not reached during the mediation, the hearing shall proceed, and a decision reached within the 45 days term.

When mediation is requested outside of a due process complaint, the Secretarial Unit is also in charge of the process of receiving, entering the data, and tracking the progress of the mediation. These mediations do not face the time constraints of those entered within the realm of a due process complaint.

PRDE’s performance under this indicator increased significantly over the last year up over 15% from 43.3% to 57.9%. Although this does not quite meet PRDE’s FFY 2006 target of 61%, it is very close and shows increased performance and success rate of mediations.

The following chart provides information on the accomplishments, progress, and slippages of the activities proposed in the SPP for the implementation of this indicator.

Activity	FFY 2006 Progress	FFY 2006 Slippages
<p>1. Include mediation as part of the statewide Personnel Development System to ensure adequate comprehension and implementation of mediation process.</p>	<p>Trainings were held January 26, 2007 (Seminar for Investigators and Social Workers), May 14, 2007 (“Orientación a Especialistas en Investigaciones Docentes y Personal de Asistencia a Padres de los Centros de Servicios de Educación Especial”), and May 25, 2007 (“Reunión Profesional Investigadores Docentes”).</p>	
<p>2. Disseminate mediation process to schools and public.</p>	<p>As reported in the FY 2005 APR, a brochure regarding mediation process had been developed and distributed to school districts and interested parties and was made available to the public. This brochure has since been revised and updated. The updated brochure is in the process of being reviewed by the Rosa Lydia Velez plaintiffs’ class. Once it is approved, it will be distributed in different dissemination activities.</p> <p>Additionally, an orientation/informative meeting was held on May 18, 2007 for parents regarding the Resolution and Mediation processes.</p> <p>PRDE participated in a radio program on RADIO Isla on May 22, 2007. The program’s purpose was to talk about resolution meetings and to clarify the differences between them and mediation meetings to the parents. This fiscal year (FFY 2007) additional radio and tv programs about mediation have been aired as well.</p>	

<p>3. Include mediation as part of the focused monitoring system.</p>	<p>PRDE monitoring guides and process were revised to include the collection of data regarding mediation. The items to be considered are whether the school district offered training, encouraged the participation in the meetings, provided the information needed, and followed up on mediation agreements.</p>	
<p>4. Encourage and publicize mediation options.</p>	<p>See progress recorded for activity # 2 above.</p>	
<p>5. Provide on-going training to mediators.</p>	<p>Training was held for mediators on November 3, 2006 (Reunión Mediadoras Manejo de Controversias y Mediación). Also, a training was held on January 25, 2007 for mediators and ALJs regarding recent updates in IDEA law including the final regulations issued in 2006. On May 30, 2007, another detailed training was held about resolution meetings according to IDEA.</p>	
<p>6. Collect evaluation feedback from mediators and mediation participants.</p>	<p>As discussed in the FY 2005 APR submission, PRDE was then in the process of developing an evaluation form. An evaluation questionnaire ("Satisfacción con el Proceso de Mediación) indeed was created and given during the period of March 2007 through June 2007. A meeting was held with General Supervisors where the evaluation questionnaire and process were explained and directives were given out for the administration of the questionnaire. Fifty-five individuals participated in the administration of the questionnaire (during March 2007-June 2007).</p>	
<p>7. Analyze evaluation feedback materials to help identify mediation skills that enhance likelihood of mediation resulting in agreement.</p>	<p>Analysis of the evaluation feedback materials occurred upon receipt of the questionnaires, and a meeting was held August 13, 2007 to discuss the analyzed results with the mediators.</p> <p>There were three sections to the questionnaire: (1) The Mediation Process, (2) The Assigned Mediator, (3) The Agreement. Participants were to select whether they (i) totally agreed, (ii) agreed, (iii) disagreed, (iv) totally disagreed, or (v) had not opinion on a series of statements under each section. The statements were phrased as affirmative positive statements about the experience with the mediation process, the mediator, and the agreement reached.</p> <p>The results of the questionnaires reflected that participants were generally extremely satisfied with the mediation process and the mediators (Sections A and B). For the majority of the statements in these two sections, over 90% of participants 'totally agreed' with the affirmative positive statements. While the majority of participants' answers reflected they were also very satisfied with the agreement</p>	

	<p>reached (Section C), with a majority of participants selecting 'totally agreed' for nearly all of these statements, the percentage of participants selecting 'totally agreed' for generally was not as high as that for the previous sections.</p> <p>The analysis results aided in the decision making process about substance and content of the August 2007 meeting.</p>	
<p>8. Schedule Mediations in a timely manner.</p>	<p>In the past, scheduling mediations in a timely matter was sometimes problematic due to the lack of staff in the office managing mediations and because of the high volume of due process complaints filed.</p> <p>Since that time, PRDE has been able to coordinate meetings on time.</p> <p>Two additional mediators were contracted by the PRDE during the summer of 2007 for a total of 5 mediators. The total number of mediators available during FFY 2006 appears to be sufficient.</p>	
<p>9. Intensify training to PRDE personnel regarding the mediation option as a means to resolve controversies as part of the statewide Personnel Development System to ensure adequate comprehension and implementation of mediation process.</p>	<p>See #1, #5, #7 above.</p>	
<p>10. Evaluate PRDE resources in order to determine if it is feasible to increase the number of mediators.</p>	<p>At this time, the number of mediators currently under contract with PRDE is sufficient.</p>	
<p>11. Continue and intensify the dissemination of information regarding mediation to the public</p>	<p>See #2 and #4 above.</p>	

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2007:

Puerto Rico plans to continue with the listed improvement activities. PRDE has specific activities in mind under each improvement activity category above for the coming year. Example of such plans regarding these improvement activities include review and revision of the mediation evaluation questionnaire as appropriate, conduct another evaluation survey this year and analyze results, continue to ensure mediation information materials are up to date and revise as appropriate, continue dissemination and training activities, and evaluate the structure of the follow-up unit to ensure continuous monitoring of mediation agreements.

Part B State Annual Performance Report (APR) for FFY 2006

Overview of the Annual Performance Report Development:

Monitoring Priority: Effective General Supervision Part B / General Supervision

Indicator 20: State reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate.

(20 U.S.C. 1416(a)(3)(B))

Measurement:

State reported data, including 618 data and annual performance reports, are:

- a. Submitted on or before due dates (February 1 for child count, including race and ethnicity; placement; November 1 for exiting, discipline, personnel; and February 1 for Annual Performance Reports); and
- b. Accurate (describe mechanisms for ensuring error free, consistent, valid and reliable data and evidence that these standards are met).

FFY	Measurable and Rigorous Target
2006	100%

Actual Target Data for 2006: 89%

PRDE initially computed its actual target data for the FFY 2006 APR by looking at the timely submission of its 618 data reports; PRDE is now updating its data to use the tables OSEP used and attempted to email to PRDE on April 7, 2008. OSEP’s charts appeared as follows:

OSEP Chart #1

SPP/APR Data - Indicator 20				
APR Indicator	Valid and Reliable	Correct Calculation	Followed Instructions	Total
1	0		1	1
2	0		1	1
3A	N/A	N/A	N/A	0
3B	1	1	1	3
3C	1	1	1	3
4A	1	1	1	3
5	1	1	1	3
7	1	1	1	3

8	1	1	1	3
9	N/A	N/A	N/A	0
10	N/A	N/A	N/A	0
11	0	0	0	0
12	1	1	1	3
13	0	1	1	2
14	0	1	1	2
15	0	1	1	2
16	1	1	1	3
17	1	1	1	3
18	1	1	1	3
19	1	1	1	3
			Subtotal	41
APR Score Calculation		Timely Submission Points - If the FFY2006 APR was submitted on-time, place the number 5 in the cell on the right.		5
		Grand Total - (Sum of subtotal and Timely Submission Points) =		46

PRDE requests that OSEP reconsider the scoring of this chart for Indicator 11. PRDE believes it followed the instructions, made a correct calculation, and supplied valid and reliable data. Additionally, with this submission, PRDE has updated and supplied valid and reliable data for Indicators 1 and 2. Accordingly, PRDE requests that OSEP reconsider its scoring of Indicators 1 and 2 to award PRDE credit for this fact. These items would combine for a total increase of five points in PRDE’s subtotal and grand total, resulting in a new subtotal of 46 and a new grand total of 51.

OSEP Chart #2

618 Data - Indicator 20					
Table	Timely	Complete Data	Passed Edit Check	Responded to Data Note Requests	Total
Table 1 - Child Count Due Date: 2/1/07	1	1	1	0	3
Table 2 - Personnel Due Date: 11/1/07	1	1	1	N/A	3
Table 3 - Ed. Environments Due Date: 2/1/07	0	0	1	1	2

Table 4 - Exiting Due Date: 11/1/07	1	1	0	N/A	2
Table 5 - Discipline Due Date: 11/1/07	1	1	1	N/A	3
Table 6 - State Assessment Due Date: 2/1/07	1	1	1	N/A	3
Table 7 - Dispute Resolution Due Date: 11/1/07	1	1	1	N/A	3
				Subtotal	19
618 Score Calculation			Grand Total (Subtotal X 2) =		38

OSEP Chart #3

Indicator #20 Calculation	
A. APR Grand Total	46
B. 618 Grand Total	38
C. APR Grand Total (A) + 618 Grand Total (B) =	84
Total N/A in APR	9
Total N/A in 618	10
Base*	100
D. Subtotal (C divided by Base*) =	0.840
E. Indicator Score (Subtotal D x 100) =	84.0

*Note any cell marked as N/A will decrease the denominator by 1 for APR and 2 for 618

For the reasons discussed under OSEP Chart #1 above, PRDE believes the APR Grand Total (A) should be 51 and the APR Grand Total + 618 Grand Total (C) should be 89. Then, 89/100 = 89%. Accordingly, PRDE calculates its actual target data for this indicator to be 89%.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2006:

PRDE have provided data for all indicators, based on data 618 reported to WESTAT. Special Education Program established few strategies to work on the validation of the data.

For Child Count and Placement alternatives:

General supervisors at the CSEE were trained on how to collect the data and on validation process. After having the data Supervisors bring it back to the teacher who certifies that the students in their list are been served and that the information on disability, age, school level and other are correct and official. Once the information is check by the teacher the school Director certifies the information. The district supervisor validates and certifies for second time the information provided by the School Director and send to the CSEE Director a report of their District. Every CSEE Director compiles all district information; certify the information based on his/her documentation and send it back to the Secretariat where the report is originated.

To validate Table 2 Reporting Special Ed Personnel:

Data provided from Special Education Human Resource Unit was compare to data available in Human Resources Secretariat. Revision was made to the roster of personnel hired by the Corporations. For a final consideration an overview of last year data was made to compare data between years.

For Table 3 Exited and Table 4 Discipline removals

District Supervisor are responsible the collected data from school and revised that the information is complete and validate and certified by school Directors and sent the information to Central Level. At this level a task force is in place to verify that all school presents their information. For the revision PRDE school directory is used to guarantee 100 % of school participation for this report.

Table 6 for Assessment report is validated in collaboration with data provided by PRDE Evaluation Unit. This data is under secretary Academic affairs secretariat.

It's important to remind that a new data based system is in place to give us the opportunity to improve our data management and reporting. PRDE expect to report all data EDEN only so the new data based system will serve to this purposes.

Activities	Timelines	Resources
Continue with the special education personnel and other related staff in the new data based information system.	Continuously	Special Education data information Unit In collaboration with the contracted company.

Continue with our data based information system island wide implementation	Continuously	Special Education data information Unit
Incorporate new elements to the data system to improve in our data collection and reporting (Transportation, Assistive technology, Appointments coordination) Complaints / Due Process Hearings	March 2008 June 2008	Special Education data information Unit