



GOVERNMENT OF PUERTO RICO
DEPARTMENT OF EDUCATION

OFFICE OF THE SECRETARY

May 29, 2012

Mr. Michael Yudin
Acting Assistant Secretary
for Elementary and Secondary Education
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

**SIG TEACHER AND PRINCIPAL EVALUATION SYSTEMS
TIMELINE EXTENSION WAIVER**

Dear Mr. Yudin:

I am writing on behalf of the Commonwealth of Puerto Rico (Puerto Rico) to request a waiver of the requirement in Section I.A.2(d)(1)(i)(B) of the final requirements for the School Improvement Grants (SIG) program, which requires a local educational agency (LEA) to develop and implement teacher and principal evaluation systems that meet certain requirements during the first year a school is implementing the transformation model. Those systems must be rigorous, transparent, and equitable and take into account data on student academic growth as a significant factor as well as other factors, such as multiple observation-based assessments of performance, ongoing collections of information on professional practice to improve of student academic achievement, and increased high school graduation rates. This waiver would permit Puerto Rico Department of Education's (PRDE), in accordance with criteria the PRDE, to permit an LEA that is implementing the transformation model in one or more schools to take additional time to implement high-quality evaluation systems that meet these requirements.

I understand that this waiver would apply only to evaluation systems for cohort 1 and cohort 2 SIG schools as follows:

- For a school that began implementing the transformation model during the **2011–2012** school year (cohort 1) PRDE must develop its evaluation system during that year and, at a minimum, pilot them for all teachers and principals beginning on 2012–2013 school year. The piloted systems should be capable of being used for decisions regarding, for example, retention, promotion, compensation, and rewards, no later than the 2013–2014 school year.
- A school that begins implementing the transformation model in the **2012–2013** school year (cohort 2) must pilot its evaluation systems for all teachers and principals during the

P.O. BOX 190759, SAN JUAN, PUERTO RICO 00919-0759 * PHONE: (787) 773-5800 * FAX: (787) 250-0275

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2012–2013 school year, and use the system in the school, including for decisions regarding, for example, retention, promotion, compensation, and rewards, no later than the 2013–2014 school year.

Puerto Rico seeks this waiver because regulations regarding the evaluation systems have been revised and amended but deems it necessary to conduct a more thorough examination of all of its documents, policies and procedures, including the participation of all stakeholders involved. PRDE will create focus groups to assure the compliance in different education aspects, conduct content validity studies for each evaluation instrument, to test instruments for inter-rater reliability and to systematically train evaluators to assure consistency in their evaluations and reliability of their judgments over time. Puerto Rico believes that the additional time will enable our schools to meet SIG requirements while encouraging the development and implementation of high-quality teacher and principal evaluation systems; which will result in an increase on the quality of instruction for students and improving their academic achievement. PRDE will also provide training on the new evaluation system.

Puerto Rico has set the following annual measurable objectives in Spanish and mathematics for the 2011–2012 school year: (Refer to Appendix B in the Accountability Workbook as it appears in PRDE’s website in OFA Section).

Academic Year	Spanish	Mathematics
2002-2003	32.70	36.70
2003-2004	32.70	36.70
2004-2005	49.53	54.03
2005-2006	49.53	54.03
2006-2007	49.53	54.03
2007-2008	66.35	69.35
2008-2009	66.35	69.35
2009-2010	66.35	69.35
2010-2011	83.18	84.68
2011-2012	83.18	84.68
2012-2013	83.18	84.68
2013-2014	100.0	100.0

Puerto Rico will determine adequate yearly progress (AYP) based on assessments administered in the 2011–2012 school year in accordance with the requirements of section 1111(b)(2) of the Elementary and Secondary Education Act of 1965.

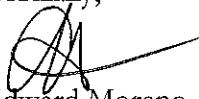
If granted a waiver of the implementation timeline for the evaluation systems requirements of the transformation model, PRDE assures it will:

- Develop criteria that:
 - Puerto Rico will use to set and meet the timeline for developing and implementing evaluation systems and evaluate District's request for timeline extension including whether a District has demonstrated sufficient commitment to, and progress in, implementing principal and teacher evaluation systems for its cohort 1 and 2 schools to justify the receipt of a timeline extension and whether, if an extension is granted, the District will be able to meet the timelines set forth by PRDE for implementing the evaluation system; and
 - Enable Puerto Rico to distinguish among those Districts that have met the requirements, those that are making sufficient progress toward meeting the requirements, and those that have not made a good-faith effort to meet the requirements.
- Approves District's request to implement the waiver only if PRDE determines, based on its criteria, that the District warrants an extension of the evaluation systems timeline.
- Develop a technical assistance and support plan that outlines how PRDE will differentiate support to Districts based on their current level of implementation and will provide the assistance needed to meet the evaluation system requirements. The technical assistance will include but is not limited to: discussions and trainings to evaluators and personnel to be evaluated, guidance regarding evidence (documentation) required from evaluators and persons to be evaluated to support the process, training on how to conduct the post-evaluation interviews.
- Develop a monitoring plan specifically for the Districts that receive timeline extensions, that will help ensure that the Districts are on track to pilot the required evaluation systems no later than the 2013–2014 school year (cohorts 1 and 2) and fully implement the evaluation systems no later than the 2014–2015 school year (cohort 2), as required.
- Determine what action it will take with respect to Districts that have not made a good-faith effort to meet the evaluation system requirements.
- Within 30 days of receiving the waiver from the U.S. Department of Education (Department), post on its public Web site the criteria, process, and timeline for reviewing an LEA's extension request.
- Within 30 days of approving District extension requests, post on its public Web site and submit to the Department (via e-mail to school.improvement.grants@ed.gov) the names of the LEAs (including their NCES District Identification Number) for which it has approved a timeline extension and the schools (including their NCES School Identification Number) within those LEAs that will benefit from the extension, including an indication of the cohort to which each school belongs.

Prior to submitting this waiver request, PRDE provided all Districts in Puerto Rico with a notice and a reasonable opportunity to comment on the request. PRDE provided the notice by sending an **email** to each District on this same date (see copy of notice attached). Copies of all comments that PRDE received from Districts in response to this notice are attached hereto. PRDE has also provided notice and information regarding this waiver request to the public in the manner in which PRDE customarily provides such notice and information to the public by posting information regarding the waiver request on its Web site (see attached copy of public notice). The public notice will include a summary of processes and stakeholders involved and next steps and public comments regarding the instruments.

Please feel free to contact me or the Under Secretary for Academic Affairs, Dr. Griselle Muñoz, if you have any questions regarding this request. Our email contact information is moreno_e@de.pr.gov and munozmg@de.gov.pr Thank you for your consideration.

Cordially,



Edward Moreno Alonso, Ed. D.
Secretary