



Race to the Top – Early Learning Challenge Review



Technical Review Form Page

Application # PR-5032

Peer Reviewer: [Redacted]
Lead Monitor: [Redacted]
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CORE AREAS (A) and (B)

States must address in their application all of the selection criteria in the Core Areas.

A. Successful State Systems

Table with 3 columns: Core Area, Available, Score. Row 1: (A)(1) Demonstrating past commitment to early learning and development, 20, 12

The extent to which the State has demonstrated past commitment to and investment in high-quality, accessible Early Learning and Development Programs and services for Children with High Needs, as evidenced by the State's--

(a) Financial investment, from January 2007 to the present, in Early Learning and Development Programs, including the amount of these investments in relation to the size of the State's population of Children with High Needs during this time period;

(b) Increasing, from January 2007 to the present, the number of Children with High Needs participating in Early Learning and Development Programs;

(c) Existing early learning and development legislation, policies, or practices; and

(d) Current status in key areas that form the building blocks for a high quality early learning and development system, including Early Learning and Development Standards, Comprehensive Assessment Systems, health promotion practices, family engagement strategies, the development of Early Childhood Educators, Kindergarten Entry Assessments, and effective data practices.

Scoring Rubric Used: Quality

Comments on (A)(1)

(a) The state's funding for early childhood programs increased from 2007 to present for EHS/HS, state funded preschool, special education and related services (an increase of \$44 million) and CCDF. The state contribution to Part C has decreased slightly since 2007. The state investment in early childhood programs is a strength. (b) The number of children served in these programs has increased since 2007: Early Head Start, Part C and Part B, CCDF (significant increase). All other programs have shown a slight decrease in numbers of children served. (c) Key legislation included creating community flexibility to establish collaborations with state agencies for child care programs when local resources are limited. This is a strength because it opens up more options for local community Early Learning and Development (ELD) services. Licensing requirements have been updated. New requirements include website publication of all licensed child care centers in Puerto Rico (PR) and all child care centers must have emergency plans. The website information will serve as a starting point to give parents more detailed information about centers and the quality of services. (d) Current status: Early learning standards have been developed, a QRIS instrument was started in 2010 as a pilot, multiple short term trainings have been offered and some longer term training, an Early Childhood State Advisory Council was established in 2009, health promotion practices through health services are in place; home visits, community outreach and family engagement services are available. The Early Childhood State Advisory Council plans to develop a data system building on effective data practices. A Kindergarten assessment is in place. Key areas that form building blocks for high quality early learning and development systems are being addressed but are not well established.

Table with 3 columns: Core Area, Available, Score. Row 2: (A)(2) Articulating the State's rationale for its early learning and development reform agenda and goals, 20, 6

The extent to which the State clearly articulates a comprehensive early learning and development reform agenda that is ambitious yet achievable, builds on the State's progress to date (as demonstrated in selection criterion (A)(1)), is most likely to result in improved school readiness for Children with High Needs, and includes--

- (a) Ambitious yet achievable goals for improving program quality, improving outcomes for Children with High Needs statewide, and closing the readiness gap between Children with High Needs and their peers;
- (b) An overall summary of the State Plan that clearly articulates how the High-Quality Plans proposed under each selection criterion, when taken together, constitute an effective reform agenda that establishes a clear and credible path toward achieving these goals; and
- (c) A specific rationale that justifies the State's choice to address the selected criteria in each Focused Investment Area (C), (D), and (E), including why these selected criteria will best achieve these goals.

Scoring Rubric Used: **Quality**

**Comments on (A)(2)**

(a) The applicant described initiatives that are currently in place in the state that minimally address improving the quality of programs and where needs exist. For example, PR has had Learning and Development Standards since 2000 which are being used by Early Head Start, Head Start and Child Care Development Fund (CCDF) programs. Identified needs include the development of family engagement standards. There were no measurable goals outlined. (b) The applicant discussed a lack of adequate organizational structure and resources needed to improve, in collaboration with all agencies, a system to support the early learning process. The application did not include a state reform agenda or a summary of a state plan with goals for improved school readiness for Children with High Needs. (c) The proposal addresses all the selection criteria in each Focused Investment Area. A rationale was not provided for the applicant's decisions to address all the Focused Investment Areas.

	Available	Score
<b>(A)(3) Aligning and coordinating early learning and development across the State</b>	<b>10</b>	<b>5</b>

The extent to which the State has established, or has a High-Quality Plan to establish, strong participation and commitment in the State Plan by Participating State Agencies and other early learning and development stakeholders by--

(a) Demonstrating how the Participating State Agencies and other partners, if any, will identify a governance structure for working together that will facilitate interagency coordination, streamline decision making, effectively allocate resources, and create long-term sustainability and describing--

(1) The organizational structure for managing the grant and how it builds upon existing interagency governance structures such as children's cabinets, councils, and commissions, if any already exist and are effective;

(2) The governance-related roles and responsibilities of the Lead Agency, the State Advisory Council, each Participating State Agency, the State's Interagency Coordinating Council for part C of IDEA, and other partners, if any;

(3) The method and process for making different types of decisions (e.g., policy, operational) and resolving disputes; and

(4) The plan for when and how the State will involve representatives from Participating Programs, Early Childhood Educators or their representatives, parents and families, including parents and families of Children with High Needs, and other key stakeholders in the planning and implementation of the activities carried out under the grant;

(b) Demonstrating that the Participating State Agencies are strongly committed to the State Plan, to the governance structure of the grant, and to effective implementation of the State Plan, by including in the MOU or other binding agreement between the State and each Participating State Agency--

(1) Terms and conditions that reflect a strong commitment to the State Plan by each Participating State Agency, including terms and conditions designed to align and leverage the Participating State Agencies' existing funding to support the State Plan;

(2) "Scope-of-work" descriptions that require each Participating State Agency to implement all applicable portions of the State Plan and a description of efforts to maximize the number of Early Learning and Development Programs that become Participating Programs; and

(3) A signature from an authorized representative of each Participating State Agency; and

(c) Demonstrating commitment to the State Plan from a broad group of stakeholders that will assist the State in reaching the ambitious yet achievable goals outlined in response to selection criterion (A)(2)(a), including by obtaining--

(1) Detailed and persuasive letters of intent or support from Early Learning Intermediary Organizations, and, if

applicable, local early learning councils; and

(2) Letters of intent or support from such other stakeholders as Early Childhood Educators or their representatives; the State's legislators; local community leaders; State or local school boards; representatives of private and faith-based early learning programs; other State and local leaders (e.g., business, community, tribal, civil rights, education association leaders); adult education and family literacy State and local leaders; family and community organizations (e.g., parent councils, nonprofit organizations, local foundations, tribal organizations, and community-based organizations); libraries and children's museums; health providers; and postsecondary institutions.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (A)(3)**

(a)(1) The organizational structure for managing this grant would be led by the Early Childhood State Advisory Council (SAC) which builds on an existing structure that will be expanded. The SAC will oversee the activities of state agencies and a group of coordinators. (2) MOUs have been signed with the Office of the Governor, where the SAC is housed, and the following departments: Family, Health, Education, Administration of the Integral Child Care and Development, Sports and Recreation and Mental Health. MOUs are also signed with SAC and the Council on Education, United Way and the Office of General Coordination for Socioeconomic Financing and Self-Management. Roles and responsibilities are outlined in the MOUs including agreement to implement the state plan. (3) Brief information is provided on how decisions will be made. Brief information on the resolution of disputes is in the MOU. A formal process will be designed for resolving disputes, as well as guidelines for communication and orderly participation. The limited description of the governance related roles and responsibilities is a weakness of the proposal. (4) Additional partners have been identified. Each organization will be invited to have official representation at regular meetings. These included parent organizations and other key stakeholders. Besides regular meetings, a description of how these partners will be involved was lacking. (b)(1) MOUs are included. See A3(2). (2) The Scope of Work outlines tasks and responsibilities for each participating state agency related to the grant criteria. It includes efforts to increase participation of programs in the TQRIS. The delineation of responsibilities in the Scope of Work is a strength of the proposal. (3) MOUs are signed and provided in the appendices. (c)(1) Letter of support from intermediary organizations included the Sor Isolina Ferre Centers and the Head Start Directors Association. The letters offered general, overall support. (2) Letters of support came from state legislators, community non-profits, foundations, a museum, higher education institutions and a parent council.

	Available	Score
<b>(A)(4) Developing a budget to implement and sustain the work of this grant.</b>	<b>15</b>	<b>4</b>

The extent to which the State Plan--

(a) Demonstrates how the State will use existing funds that support early learning and development from Federal, State, private, and local sources (e.g., CCDF; Title I and II of ESEA; IDEA; Striving Readers Comprehensive Literacy Program; State preschool; Head Start Collaboration and State Advisory Council funding; Maternal, Infant, and Early Childhood Home Visiting Program; Title V MCH Block Grant; TANF; Medicaid; child welfare services under Title IV (B) and (E) of the Social Security Act; Statewide Longitudinal Data System; foundation; other private funding sources) for activities and services that help achieve the outcomes in the State Plan, including how the quality set-asides in CCDF will be used;

(b) Describes, in both the budget tables and budget narratives, how the State will effectively and efficiently use funding from this grant to achieve the outcomes in the State Plan, in a manner that--

(1) Is adequate to support the activities described in the State Plan;

(2) Includes costs that are reasonable and necessary in relation to the objectives, design, and significance of the activities described in the State Plan and the number of children to be served; and

(3) Details the amount of funds budgeted for Participating State Agencies, localities, Early Learning Intermediary Organizations, Participating Programs, or other partners, and the specific activities to be implemented with these funds consistent with the State Plan, and demonstrates that a significant amount of funding will be devoted to the local implementation of the State Plan; and

(c) Demonstrates that it can be sustained after the grant period ends to ensure that the number and percentage of Children with High Needs served by Early Learning and Development Programs in the State will be maintained or expanded.

Scoring Rubric Used: **Quality**

**Comments on (A)(4)**

(a) A budget is provided for 2012-2015 outlining how existing funds will be used for ELD services. There is no budget listing for state preschool which makes the status of state funded preschool programs unclear in relation to the plan. The applicant does not address how the quality set-asides in CCDF will be used. (b)(1) The budget funds seem adequate to support the activities described in the scope of work. (2) Some costs appear reasonable in relation to the tasks outlined in the budget narrative. However, Born to Learn (\$1,505,287) and the budget for the Department of Sports and Recreation (\$6 million) seem to be unnecessary costs that are not directly related to the goals of the grant. Born to Learn is a budget item to modify parks through United Way. Sports and Recreation has budget funds for physical education activities, sports and recreation instructors for young children, an early childhood recreation center, mini-golf course and bicycle course, refurbishment of a building to offer socio-educational workshops to parents with indoor activities for children (\$7 million). The sports and recreation activities have been available in the past for older children. No examples were provided of how these activities and facilities would be revised or re-created to be appropriate for younger children. (3) Detail of funds for participating agencies includes Department of Health, Department of the Family, Department of Sports and Recreation, Administration for Integral Child Care (ACUDEN), Department of Education. Unnecessary costs which are unrelated to school readiness are in the budgets from the Dept of Sports and Recreation (see (2)) and the Department of Education. The Department of Education is proposing \$6 million in quality improvement of preschool classrooms which includes fully equipping 500 preschool classrooms with furniture and materials. The applicant did not provide a rationale for how the furnishing of the classrooms would improve children's readiness for Kindergarten. Unrelated costs are a weakness of the proposal. (c) The application does not address the sustainability of continuing to serve Children with High Needs in high quality programs after the grant ends.

**B. High-Quality, Accountable Programs**

	Available	Score
<b>(B)(1) Developing and adopting a common, statewide Tiered Quality Rating and Improvement System</b>	<b>10</b>	<b>3</b>
<p>The extent to which the State and its Participating State Agencies have developed and adopted, or have a High-Quality Plan to develop and adopt, a Tiered Quality Rating and Improvement System that--</p> <p>(a) Is based on a statewide set of tiered Program Standards that include--</p> <ul style="list-style-type: none"> <li>(1) Early Learning and Development Standards;</li> <li>(2) A Comprehensive Assessment System;</li> <li>(3) Early Childhood Educator qualifications;</li> <li>(4) Family engagement strategies;</li> <li>(5) Health promotion practices; and</li> <li>(6) Effective data practices;</li> </ul> <p>(b) Is clear and has standards that are measurable, meaningfully differentiate program quality levels, and reflect high expectations of program excellence commensurate with nationally recognized standards that lead to improved learning outcomes for children; and</p> <p>(c) Is linked to the State licensing system for Early Learning and Development Programs.</p> <p>Scoring Rubric Used: <b>Quality and Implementation</b></p>		
<b>Comments on (B)(1)</b>		
<p>(a) (1-6) Learning and Development Standards that are measurable and demonstrate appropriate progression have been developed along with a manual of early learning activities. Health promotion practices are guidelines for pediatric preventive services which are not applicable to early learning programs. A comprehensive assessment system, early childhood educator qualifications and family engagement strategies have not been developed. Use of effective data practices is not addressed by the applicant. (b) The TQRIS was developed in 2010 as a pilot project. 100 programs were enrolled in the system on a voluntary basis. The majority of the programs were rated in the top tiers which raises concern about the meaningful differentiation of the tiers. (c) The Division of Licensing will establish the first level of the ORIS system to be aligned with basic licensing requirements. This is an appropriate method for linking the state licensing system to the Early Learning and Development Programs.</p>		
	Available	Score
<b>(B)(2) Promoting participation in the State's Tiered Quality Rating and Improvement System</b>	<b>15</b>	<b>2</b>

The extent to which the State has maximized, or has a High-Quality Plan to maximize, program participation in the State's Tiered Quality Rating and Improvement System by--

(a) Implementing effective policies and practices to reach the goal of having all publicly funded Early Learning and Development Programs participate in such a system, including programs in each of the following categories--

- (1) State-funded preschool programs;
- (2) Early Head Start and Head Start programs;
- (3) Early Learning and Development Programs funded under section 619 of part B of IDEA and part C of IDEA;
- (4) Early Learning and Development Programs funded under Title I of the ESEA; and
- (5) Early Learning and Development Programs receiving funds from the State's CCDF program;

(b) Implementing effective policies and practices designed to help more families afford high-quality child care and maintain the supply of high-quality child care in areas with high concentrations of Children with High Needs (e.g., maintaining or increasing subsidy reimbursement rates, taking actions to ensure affordable co-payments, providing incentives to high-quality providers to participate in the subsidy program); and

(c) Setting ambitious yet achievable targets for the numbers and percentages of Early Learning and Development Programs that will participate in the Tiered Quality Rating and Improvement System by type of Early Learning and Development Program (as listed in (B)(2)(a)(1) through (5) above).

Scoring Rubric Used: **Quality and Implementation**

**Comments on (B)(2)**

(a)(1-5) The goal of increasing the number of programs using TQRIS is 50% each year. The baseline is the 100 programs in the pilot program (from various funding streams). The final targets for participation are well below 100%. For example, the EHS/HS goal starts with a baseline of 42 programs enrolled to 126 programs enrolled by 2015 out of a total of 1,872 Head Start programs. This goal is achievable, but not ambitious because it does not demonstrate substantial enrollment based on the resources used. No targets were reported for state funded preschool which leaves the role of the state funded programs in this effort unclear. The state will also provide incentives to educators for improving their academic preparation. The type of incentives and the reward structures were not outlined. (b) The applicant identified 25 areas of the territory with the largest populations of Children with High Needs. Additional information was not provided on how these areas might be supported to help more families afford high-quality child care. The proposal states that programs in the identified high need areas will be encouraged to participate in TQRIS. (c) The goals for the raising the number of programs participating in the TQRIS are achievable but not ambitious (see (a)).

	Available	Score
<b>(B)(3) Rating and monitoring Early Learning and Development Programs</b>	15	9

The extent to which the State and its Participating State Agencies have developed and implemented, or have a High-Quality Plan to develop and implement, a system for rating and monitoring the quality of Early Learning and Development Programs participating in the Tiered Quality Rating and Improvement System by--

(a) Using a valid and reliable tool for monitoring such programs, having trained monitors whose ratings have an acceptable level of inter-rater reliability, and monitoring and rating the Early Learning and Development Programs with appropriate frequency; and

(b) Providing quality rating and licensing information to parents with children enrolled in Early Learning and Development Programs (e.g., displaying quality rating information at the program site) and making program quality rating data, information, and licensing history (including any health and safety violations) publicly available in formats that are easy to understand and use for decision making by families selecting Early Learning and Development Programs and families whose children are enrolled in such programs.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (B)(3)**

(a) Centers who are in their first year using TQRIS will be monitored three times per year. The monitors will be trained. The monitoring tool was validated by experts for content validity and piloted with 100 centers. The applicant did not address establishing overall reliability and validity for the tool. The schedule for monitoring of three program visits per year is frequent. However, the number of programs to receive these visits is unclear. The role of the monitor appears to be conflicting because they will be serving as both monitors and mentors for the same programs. (b) All centers will be required to display their rating information at their centers at the end of 2015 which is a long time for parents to wait for this information. A strength of the plan is how families will be educated about the QRIS and identifying high quality programs. Methods for educating families include an educational media campaign, participating agency websites, group orientations and brochures.

	Available	Score
<b>(B)(4) Promoting access to high-quality Early Learning and Development Programs for Children with High Needs</b>	20	4

The extent to which the State and its Participating State Agencies have developed and implemented, or have a High-Quality Plan to develop and implement, a system for improving the quality of the Early Learning and Development Programs participating in the Tiered Quality Rating and Improvement System by--

(a) Developing and implementing policies and practices that provide support and incentives for Early Learning and Development Programs to continuously improve (e.g., through training, technical assistance, financial rewards or incentives, higher subsidy reimbursement rates, compensation);

(b) Providing supports to help working families who have Children with High Needs access high-quality Early Learning and Development Programs that meet those needs (e.g., providing full-day, full-year programs; transportation; meals; family support services); and

(c) Setting ambitious yet achievable targets for increasing--

(1) The number of Early Learning and Development Programs in the top tiers of the Tiered Quality Rating and Improvement System; and

(2) The number and percentage of Children with High Needs who are enrolled in Early Learning and Development Programs that are in the top tiers of the Tiered Quality Rating and Improvement System.

Scoring Rubric Used: **Quality and Implementation**

#### Comments on (B)(4)

(a) The state plans to provide incentives and scholarships to educators for increasing their education. The applicant did not include information on higher subsidy reimbursement rates or higher compensation for educators. (b) The applicant did not address family support for accessing high-quality programs. (c)(1) A data table is provided showing where the centers in the pilot project fall within the TQRIS (baseline). The table show that all of the current programs in the pilot will be at the highest tier by 2015. There are no additional programs added to the table beyond the 100 in the pilot. The goals seem achievable but are not ambitious because only the 100 centers in the pilot are being targeted for advancement. Programs that did not participate in the pilot are not being supported in advancement. (2) Goals for increasing the number of Children with High Needs enrolled in top tier programs are only provided for EHS/HS, CCDF programs, Kindergarten and licensed private centers. In all cases, the goals are achievable but not ambitious. For example, of the 19,806 children in CCDF programs, the goal is to have 7.8 percent of these children enrolled in top tier programs by 2015.

	Available	Score
<b>(B)(5) Validating the effectiveness of the State Tiered Quality Rating and Improvement System.</b>	15	6

The extent to which the State has a High-Quality Plan to design and implement evaluations--working with an independent evaluator and, when warranted, as part of a cross-State evaluation consortium--of the relationship between the ratings generated by the State's Tiered Quality Rating and Improvement System and the learning outcomes of children served by the State's Early Learning and Development Programs by--

(a) Validating, using research-based measures, as described in the State Plan (which also describes the criteria that the State used or will use to determine those measures), whether the tiers in the State's Tiered Quality Rating and Improvement System accurately reflect differential levels of program quality; and

(b) Assessing, using appropriate research designs and measures of progress (as identified in the State Plan), the extent to which changes in quality ratings are related to progress in children's learning, development, and school readiness.

Scoring Rubric Used: **Quality**

#### Comments on (B)(5)

(a) The applicant addresses validation of the instrument for content which was done during the pilot stage of developing the TQRIS. The applicant provided no information on methods to be used to assess the accuracy of the tiers in relation to the quality of the program. (b) An external evaluator will be contracted to assess the system's functioning. A random sample of children from the pilot programs will be selected for an evaluation of their developmental progress. No information was provided in this section on what measures of progress will be used. The design of the evaluation is weak because it appears to be post assessment only.

**Focused Investment Areas (C), (D), and (E)**

Each State must address in its application--

- (1) Two or more of the selection criteria in Focused Investment Area (C);
- (2) One or more of the selection criteria in Focused Investment Area (D); and
- (3) One or more of the selection criteria in Focused Investment Area (E).

The total available points for each Focused Investment Area will be divided by the number of selection criteria that the applicant chooses to address in that area, so that each selection criterion is worth the same number of points.

**C. Promoting Early Learning and Development Outcomes for Children**

The total available points that an applicant may receive for selection criteria (C)(1) through (C)(4) is 60. The 60 points will be divided by the number of selection criteria that the applicant chooses to address so that each selection criterion is worth the same number of points. For example, if the applicant chooses to address all four selection criteria under this Focused Investment Area, each criterion will be worth up to 15 points. If the applicant chooses to address two selection criteria, each criterion will be worth up to 30 points.

The applicant must address at least two of the selection criteria within Focused Investment Area (C), which are as follows.

	Available	Score
<b>(C)(1) Developing and using statewide, high-quality Early Learning and Development Standards.</b>	<b>15</b>	<b>9</b>
<p>The extent to which the State has a High-Quality Plan to put in place high-quality Early Learning and Development Standards that are used statewide by Early Learning and Development Programs and that--</p> <p>(a) Includes evidence that the Early Learning and Development Standards are developmentally, culturally, and linguistically appropriate across each age group of infants, toddlers, and preschoolers, and that they cover all Essential Domains of School Readiness;</p> <p>(b) Includes evidence that the Early Learning and Development Standards are aligned with the State's K-3 academic standards in, at a minimum, early literacy and mathematics;</p> <p>(c) Includes evidence that the Early Learning and Development Standards are incorporated in Program Standards, curricula and activities, Comprehensive Assessment Systems, the State's Workforce Knowledge and Competency Framework, and professional development activities; and</p> <p>(d) The State has supports in place to promote understanding of and commitment to the Early Learning and Development Standards across Early Learning and Development Programs.</p> <p>Scoring Rubric Used: <b>Quality and Implementation</b></p>		
<b>Comments on (C)(1)</b>		
<p>(a) The applicant does not state that the Early Learning and Development standards are developmentally, culturally and linguistically appropriate for all age groups. The standards address eight content areas - linguistic, cognitive, physical, social, emotional, creative and moral. The Essential Domain of School Readiness - approaches to learning - may be covered under the area of creative development. The standards are also based on the National Association for the Education of Young Children's (NAEYC) developmentally appropriate practices which is a credible source. (b) The preschool standards are aligned with learning standards through 12th grade. This alignment was done by the Department of Education in 2010. This alignment did not appear to include the state standards for children 0-4 years, 11 months. (c) The state plans to provide workshops to standardize the integration of the standards into the curricula of the early childhood educators in the state. Family day care providers will be trained on the standards through mentors and technical assistance supporting a individualized action plan for each day care setting. A strength of this service is the focus on helping providers align their daily activities to the early learning standards. The applicant's plan for using the Early Learning and Development Standards did not address incorporating the standards into a comprehensive assessment system. (d) The state plans to "elaborate" legislation to require all programs to apply the standards in their settings. This support is not in place and is a weak approach for promoting commitment to the standards because the plan only addresses legislative action which is an unknown factor.</p>		
<b>(C)(2) Supporting effective uses of Comprehensive Assessment Systems.</b>	<b>15</b>	<b>7</b>

The extent to which the State has a High-Quality Plan to support the effective implementation of developmentally appropriate Comprehensive Assessment Systems by--

- (a) Working with Early Learning and Development Programs to select assessment instruments and approaches that are appropriate for the target populations and purposes;
- (b) Working with Early Learning and Development Programs to strengthen Early Childhood Educators' understanding of the purposes and uses of each type of assessment included in the Comprehensive Assessment Systems;
- (c) Articulating an approach for aligning and integrating assessments and sharing assessment results, as appropriate, in order to avoid duplication of assessments and to coordinate services for Children with High Needs who are served by multiple Early Learning and Development Programs; and
- (d) Training Early Childhood Educators to appropriately administer assessments and interpret and use assessment data in order to inform and improve instruction, programs, and services.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (C)(2)**

(a) The Ages and Stages Questionnaire has been selected as the screening instrument for the state's Comprehensive Assessment System. This tool was chosen because of its validity and recommendations by experts and the US Department of HHS. The Early Learning Standards were also cited as a tool to assess children's learning and monitor their outcomes. Efforts related to selecting formative assessments or measures of environmental quality and adult/child interactions were not described. (b) The training of educators on using the data from this instrument was described as a continuous process and a core component of the work force training. The plan is to organize a core group of trainers that will train educators to use the ASQ in relation to the standards to improve instruction, programs and service. This plan is limited by the use of one screening tool and no tools for formative assessment, environmental quality and adult/child interactions. (c) Currently assessment information from the Ages and Stages Questionnaire is shared with other agencies according to the parents' wishes. The applicant plans to make assessment reports available to program staff when a child transfers from one program to another or for service coordinator with Children with High Needs. The state plans to include this assessment information in the data system. (d) An Early Childhood Workforce Institute will be established to provide professional development on the learning standards and the ASQ. The use of one screening tool limits the data that educators have for improving instruction and programs. A more robust assessment system is needed for fostering high-quality programs.

	Available	Score
<b>(C)(3) Identifying and addressing the health, behavioral, and developmental needs of Children with High Needs to improve school readiness.</b>	15	3

The extent to which the State has a High-Quality Plan to identify and address the health, behavioral, and developmental needs of Children with High Needs by--

- (a) Establishing a progression of standards for ensuring children's health and safety; ensuring that health and behavioral screening and follow-up occur; and promoting children's physical, social, and emotional development across the levels of its Program Standards;
- (b) Increasing the number of Early Childhood Educators who are trained and supported on an on-going basis in meeting the health standards;
- (c) Promoting healthy eating habits, improving nutrition, expanding physical activity; and
- (d) Leveraging existing resources to meet ambitious yet achievable annual targets to increase the number of Children with High Needs who--
  - (1) Are screened using Screening Measures that align with the Medicaid Early Periodic Screening, Diagnostic and Treatment benefit (see section 1905(r)(5) of the Social Security Act) or the well-baby and well-child services available through the Children's Health Insurance Program (42 CFR 457.520), and that, as appropriate, are consistent with the Child Find provisions in IDEA (see sections 612(a)(3) and 635(a)(5) of IDEA);
  - (2) Are referred for services based on the results of those screenings, and where appropriate, received follow-up; and
  - (3) Participate in ongoing health care as part of a schedule of well-child care, including the number of children who are up to date in a schedule of well-child care.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (C)(3)**



(a) Guidelines for health care providers (Guías de Servicios Preventivos Pediátricos) are provided in the appendices. The use of these guidelines in relation to screening and follow-up is not addressed. The guidelines are not health standards that can be applied to early learning programs. (b-c) Training educators in health practices and promoting healthy behavior are not discussed. (d) (1-3) The data table provided goals for increasing the numbers of children served through screenings, follow-up and ongoing health care. All the goals were to reach 99% of High Needs Children by 2015 with the exception of follow-up/treatment services. The goal for follow-up and treatment was to reach 3.5% more children each year through 2015. This goal is not ambitious. The other goals are ambitious, but the lack of information for determining if the goals are achievable. For example, the application does not include information on what staff and how many staff will be trained in the health standards, who will conduct screenings and who will be responsible for follow-up.

	Available	Score
<b>(C)(4) Engaging and supporting families.</b>	<b>15</b>	<b>6</b>
<p>The extent to which the State has a High-Quality Plan to provide culturally and linguistically appropriate information and support to families of Children with High Needs in order to promote school readiness for their children by--</p> <p>(a) Establishing a progression of culturally and linguistically appropriate standards for family engagement across the levels of its Program Standards, including activities that enhance the capacity of families to support their children's education and development;</p> <p>(b) Increasing the number and percentage of Early Childhood Educators trained and supported on an on-going basis to implement the family engagement strategies included in the Program Standards; and</p> <p>(c) Promoting family support and engagement statewide, including by leveraging other existing resources such as through home visiting programs, other family-serving agencies, and through outreach to family, friend, and neighbor caregivers.</p>		

Scoring Rubric Used: **Quality and Implementation**

**Comments on (C)(4)**

(a) The state does not have family engagement standards. Family engagement strategies are provided in an appendix as descriptions of existing programs that serve families. The state plans to develop family engagement standards using a multidisciplinary team and to have the standards supported by legislation. Lack of detail on how the standards will be developed is a weakness of this plan. (b) The proposal describes disseminating the standards to allow early learning programs to develop aligned strategies. The proposal does not indicate how many or what percentage of educators will be trained or supported in using family engagement strategies. (c) The standards will be disseminated by media and training professionals. Family members who receive training through the Child Care Resource & Referral (CCR&R) organizations will develop a family profile. The profile aggregated profile information will be used to design trainings to address family situations and needs which is an effective use of this data.

**D. A Great Early Childhood Education Workforce**

*The total points that a State may earn for selection criteria (D)(1) and (D)(2) is 40. The 40 points will be divided by the number of selection criteria that the applicant chooses to address so that each selection criterion is worth the same number of points. For example, if the applicant chooses to address both selection criteria under this Focused Investment Area, each criterion will be worth up to 20 points. If the applicant chooses to address one selection criterion, the criterion will be worth up to 40 points.*

*The applicant must address at least one of the selection criteria within Focused Investment Area (D), which are as follows:*

	Available	Score
<b>(D)(1) Developing a Workforce Knowledge and Competency Framework and a progression of credentials.</b>	<b>20</b>	<b>7</b>
<p>The extent to which the State has a High-Quality Plan to--</p> <p>(a) Develop a common, statewide Workforce Knowledge and Competency Framework designed to promote children's learning and development and improve child outcomes;</p> <p>(b) Develop a common, statewide progression of credentials and degrees aligned with the Workforce Knowledge and Competency Framework; and</p> <p>(c) Engage postsecondary institutions and other professional development providers in aligning professional development opportunities with the State's Workforce Knowledge and Competency Framework.</p>		

Scoring Rubric Used: **Quality and Implementation**

**Comments on (D)(1)**

(a) The state does not currently have a Workforce Knowledge and Competency Framework (WKCF) and a progression of credentials. Their Babysteps Guide (TQRIS) is used by the 100 early childhood programs in the TQRIS pilot study. It includes a section on staff competencies. These competencies are in an appropriately tiered progression. (b) The state plans to establish a Early Childhood Workforce Institute to coordinate the development of a WKCF. The framework will have professional competencies with observable criteria and technical, human and conceptual skills. The three levels of the framework are proposed to be beginner, intermediate and advanced. More tiers in the framework would allow for more definition and more opportunity for advancement. (c) A general plan is provided for how the Early Childhood Workforce Institute will partner with higher education and professional boards to develop the WKCF in coordination with the state early childhood council. The letter of support from the President of the University of Puerto Rico does not address the task of developing a WKCF with the workforce institute.

	Available	Score
<b>(D)(2) Supporting Early Childhood Educators in Improving their knowledge, skills, and abilities.</b>	20	4

The extent to which the State has a High-Quality Plan to improve the effectiveness and retention of Early Childhood Educators who work with Children with High Needs, with the goal of improving child outcomes by--

(a) Providing and expanding access to effective professional development opportunities that are aligned with the State's Workforce Knowledge and Competency Framework;

(b) Implementing policies and incentives (e.g., scholarships, compensation and wage supplements, tiered reimbursement rates, other financial incentives, management opportunities) that promote professional improvement and career advancement along an articulated career pathway that is aligned with the Workforce Knowledge and Competency Framework, and that are designed to increase retention;

(c) Publicly reporting aggregated data on Early Childhood Educator development, advancement, and retention; and

(d) Setting ambitious yet achievable targets for--

(1) Increasing the number of postsecondary institutions and professional development providers with programs that are aligned to the Workforce Knowledge and Competency Framework and the number of Early Childhood Educators who receive credentials from postsecondary institutions and professional development providers that are aligned to the Workforce Knowledge and Competency Framework; and

(2) Increasing the number and percentage of Early Childhood Educators who are progressing to higher levels of credentials that align with the Workforce Knowledge and Competency Framework.

Scoring Rubric Used: **Quality and Implementation**

#### Comments on (D)(2)

(a) This section outlined training programs offered through higher education for degrees and continuing education. No mention was made of how these programs will be expanded with grant funds. (b) The state plans to establish a scholarship program for service providers for earning a CDA, special education certificate, early education certificate or early intervention certificate. No details were provided on the types of scholarships or how many will be provided. (c) The proposal stated that access to Race to the Top funds will allow the state to report aggregate data on educator advancement and retention. (d)(1) Currently none of the higher education institutions or professional development providers are aligned with the WKCF because there is not one. The goal for 2015 is to have 100% of these entities aligned with the WKCF and to have 400 educators credentialed through aligned institutions. Because the framework has not been developed, the goal of having all 21 post secondary training organizations aligned by 2015 does not seem achievable. The goal of having 400 educators credentialed by aligned institutions also does not seem realistic because the alignment has not been completed. (2) The state currently does not have a system for reporting on the number of educators advancing their credentials or being retained. Only the number of educators earning a CDA was provided in the data table. The goal was to increase the number of educators with a CDA from the baseline of 634 to 834 by 2015. It is difficult to determine if this is an ambitious or achievable goal because this effort could not be connected to budget information or professional development activities. A lack of baseline data on educator's credential status from which to develop goals is a weakness of the proposal.

## E. Measuring Outcomes and Progress

The total points an applicant may earn for selection criteria (E)(1) and (E)(2) is 40. The 40 points will be divided by the number of selection criteria that the applicant chooses to address so that each selection criterion is worth the same number of points. For example, if the applicant chooses to address both selection criteria under this Focused Investment Area, each criterion will be worth up to 20 points. If the applicant chooses to address one selection criterion, the criterion will be worth up to 40 points.

The applicant must address at least one of the selection criteria within Focused Investment Area (E) which are as follows:

	Available	Score
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**(E)(1) Understanding the status of children's learning and development at kindergarten entry.**

20

9

The extent to which the State has a High-Quality Plan to implement, independently or as part of a cross-State consortium, a common, statewide Kindergarten Entry Assessment that informs instruction and services in the early elementary grades and that--

- (a) Is aligned with the State's Early Learning and Development Standards and covers all Essential Domains of School Readiness;
- (b) Is valid, reliable, and appropriate for the target population and for the purpose for which it will be used, including for English learners and children with disabilities;
- (c) Is administered beginning no later than the start of school year 2014-2015 to children entering a public school kindergarten; States may propose a phased implementation plan that forms the basis for broader statewide implementation;
- (d) Is reported to the Statewide Longitudinal Data System, and to the early learning data system, if it is separate from the Statewide Longitudinal Data System, as permitted under and consistent with the requirements of Federal, State, and local privacy laws; and
- (e) Is funded, in significant part, with Federal or State resources other than those available under this grant, (e.g., with funds available under section 6111 or 6112 of the ESEA).

Scoring Rubric Used: **Quality and Implementation**

**Comments on (E)(1)**

(a) The state's Kindergarten Entry Assessment is a teacher observation scale aligned with the birth to preschool Learning Standards and Grade Level Expectations. The assessment covers the Essential Domains of School Readiness with the exception of approaches to learning as stated in the discussion of the instrument. However, conflicting information was provided because approaches to learning is included in tables of outcomes from the instrument, but physical and social/emotional development were not included in the table. (b) The proposal states that the instrument is reliable and valid as a result of discussions of outcomes with peers, social workers and parents. The applicant does not address rigorous testing of the instrument for reliability and validity. (c) The assessment is steadily being used more by Puerto Rican school districts. No indication is made of what percent of districts are using the assessment or of plans for increasing its use. (d) Plans for reporting Kindergarten assessment results in a data system are vague. The proposal describes strengthening the data system to ensure that Kindergarten assessment data is collected. (e) The Kindergarten assessment is funded through the Department of Education. Although not directly stated, the plan suggests this will continue because funds are not being requested for the implementation of the instrument.

	Available	Score
<b>(E)(2) Building or enhancing an early learning data system to improve instruction, practices, services, and policies.</b>	20	12

The extent to which the State has a High-Quality Plan to enhance the State's existing Statewide Longitudinal Data System or to build or enhance a separate, coordinated, early learning data system that aligns and is interoperable with the Statewide Longitudinal Data System, and that either data system--

- (a) Has all of the Essential Data Elements;
- (b) Enables uniform data collection and easy entry of the Essential Data Elements by Participating State Agencies and Participating Programs;
- (c) Facilitates the exchange of data among Participating State Agencies by using standard data structures, data formats, and data definitions such as Common Education Data Standards to ensure interoperability among the various levels and types of data;
- (d) Generates information that is timely, relevant, accessible, and easy for Early Learning and Development Programs and Early Childhood Educators to use for continuous improvement and decision making; and
- (e) Meets the Data System Oversight Requirements and complies with the requirements of Federal, State, and local privacy laws.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (E)(2)**

(a) The state plans to build an early learning data system and will work in collaboration with the development of a statewide longitudinal data system. The plan for the system includes all the Essential Data Elements. (b) The applicant does not address uniform data entry and collection across the two systems. However, the codevelopment of the two systems may allow for uniformity. (c) The Department of Education's Student Information System has been created. It will provide a starting point for information being collected for all students in the public school system. The system developers will use the National Information Exchange Model and other national standards for the system. The development plan also includes researching other state systems to learn from their experience which is a wise approach to learning from similar systems. (d) The initial phase of the project will address laws and regulations for data systems. The four phase plan for developing this system is a strength of the proposal because it is detailed and well formulated. The state plans to purchase an already existing system in the software market and expects full implementation within 36 months which seems to be an appropriate timeline.

	Available	Score
<b>Total Points Available for Selection Criteria</b>	<b>280</b>	<b>108</b>

**Priorities**

Competitive Preference Priorities

	Available	Score
<b>Competitive Preference Priority 2: Including all Early Learning and Development Programs in the Tiered Quality Rating and Improvement System</b>	<b>10</b>	<b>3</b>

Competitive Preference Priority 2 is designed to increase the number of children from birth to kindergarten entry who are participating in programs that are governed by the State's licensing system and quality standards, with the goal that all licensed or State-regulated programs will participate. The State will receive points for this priority based on the extent to which the State has in place, or has a High-Quality Plan to implement no later than June 30, 2015--

(a) A licensing and inspection system that covers all programs that are not otherwise regulated by the State and that regularly care for two or more unrelated children for a fee in a provider setting; provided that if the State exempts programs for reasons other than the number of children cared for, the State may exclude those entities and reviewers will score this priority only on the basis of non-excluded entities; and

(b) A Tiered Quality Rating and Improvement System in which all licensed or State-regulated Early Learning and Development Programs participate.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (P)(2)**

(a) The plan does not propose to seek licensing for family, friend and neighbor care. In addition, the state funded programs are not included in the QRIS. Participation in the QRIS system will be voluntary for the first two years while the licensing division is restructured. However, Head Start programs will be required to obtain licenses. The proposal stated that incentives would be provided but gave no detail about what incentives, to whom and how many. No goals were outlined for the number of programs that would be licensed. (b) The state plans to develop a family day care instrument after the QRIS has been developed for center based programs, so including the family day cares in the QRIS could be a long term process. A mentoring system for technical assistance to family day cares will be developed. No timeline or goals were provided for these activities.

**Priorities**

	Available	Yes/No
<b>Competitive Preference Priority 3: Understanding the Status of Children's Learning and Development at Kindergarten Entry</b>	<b>0 or 10</b>	<b>No</b>

To meet this priority, the State must, in its application--

(a) Demonstrate that it has already implemented a Kindergarten Entry Assessment that meets selection criterion (E)(1) by indicating that all elements in Status Table (A)(1)-12 are met; or

(b) Address selection criterion (E)(1) and earn a score of at least 70 percent of the maximum points available for that criterion.

**Comments on (P)(3)**

The application indicated on Table (A)(1)-12 that all elements were not present in their Kindergarten assessment.

Absolute Priority

	Met? Yes/No
<b>Absolute Priority - Promoting School Readiness for Children with High Needs.</b>	<b>No</b>
<p>To meet this priority, the State's application must comprehensively and coherently address how the State will build a system that increases the quality of Early Learning and Development Programs for Children with High Needs so that they enter kindergarten ready to succeed.</p> <p>The State's application must demonstrate how it will improve the quality of Early Learning and Development Programs by integrating and aligning resources and policies across Participating State Agencies and by designing and implementing a common, statewide Tiered Quality Rating and Improvement System. In addition, to achieve the necessary reforms, the State must make strategic improvements in those specific reform areas that will most significantly improve program quality and outcomes for Children with High Needs. Therefore, the State must address those criteria from within each of the Focused Investment Areas (sections (C) Promoting Early Learning and Development Outcomes for Children, (D) A Great Early Childhood Education Workforce, and (E) Measuring Outcomes and Progress) that it believes will best prepare its Children with High Needs for kindergarten success.</p>	
<b>Comments on Absolute Priority</b>	
<p>The state's plan for building high-quality systems was vague and undefined. Most of the activities for the grant are not yet implemented. Plans for goals and activities such as developing standards and frameworks, supporting participation in the TQRIS, professional development and measuring outcomes and progress were unclear. The connections between the plans and helping Children with High Needs enter Kindergarten ready to succeed was not comprehensively or coherently addressed.</p>	



Race to the Top – Early Learning Challenge Review



Technical Review Form Page

Application # PR-5032

Peer Reviewer: [Redacted]
Lead Monitor: [Redacted]
Support Monitor: [Redacted]
Application Status: Reviewed
Date/Time: 11/17/2011 - 12:56 PM

CORE AREAS (A) and (B)

States must address in their application all of the selection criteria in the Core Areas.

A. Successful State Systems

Table with 3 columns: Core Area, Available, Score. Row 1: (A)(1) Demonstrating past commitment to early learning and development, 20, 15. Includes detailed text about Puerto Rico's early childhood system and a 'Comments on (A)(1)' section.

**(A)(2) Articulating the State's rationale for its early learning and development reform agenda and goals.**

20

10

The extent to which the State clearly articulates a comprehensive early learning and development reform agenda that is ambitious yet achievable, builds on the State's progress to date (as demonstrated in selection criterion (A)(1)), is most likely to result in improved school readiness for Children with High Needs, and includes--

- (a) Ambitious yet achievable goals for improving program quality, improving outcomes for Children with High Needs statewide, and closing the readiness gap between Children with High Needs and their peers;
- (b) An overall summary of the State Plan that clearly articulates how the High-Quality Plans proposed under each selection criterion, when taken together, constitute an effective reform agenda that establishes a clear and credible path toward achieving these goals; and
- (c) A specific rationale that justifies the State's choice to address the selected criteria in each Focused Investment Area (C), (D), and (E), including why these selected criteria will best achieve these goals.

Scoring Rubric Used: **Quality**

**Comments on (A)(2)**

Puerto Rico has used the RTT-ELC proposal development process as an opportunity for self-assessment and has addressed many gaps and needs through this proposal. The summary of the state plan highlights the priorities for action for PR. The territory intends to take their early learning standards to the next level, through provision of training and to align the standards with curricula and evaluation processes. The proposal addresses screening and assessment practices to support administration, interpretation and use of assessment data to improve instruction, programs and services. A focus on the work force and the development of core knowledge is highlighted. PR builds on the variety of family engagement strategies and will establish common standards for family engagement across the ELD system. The focus of health promotion is to develop parks and outside play spaces for young children. The data system requires organizational structure and resources to function effectively, with some programs entering data manually, while others have developed computerized systems. The goals for improving program quality and outcomes for children with high needs are not clearly stated. The narrative describing the reform agenda does not indicate how these activities will lead to improved school readiness for children with high needs. No rationale was provided for the choice of focused investment areas.

	Available	Score
<b>(A)(3) Aligning and coordinating early learning and development across the State</b>	10	5

The extent to which the State has established, or has a High-Quality Plan to establish, strong participation and commitment in the State Plan by Participating State Agencies and other early learning and development stakeholders by--

(a) Demonstrating how the Participating State Agencies and other partners, if any, will identify a governance structure for working together that will facilitate interagency coordination, streamline decision making, effectively allocate resources, and create long-term sustainability and describing--

(1) The organizational structure for managing the grant and how it builds upon existing interagency governance structures such as children's cabinets, councils, and commissions, if any already exist and are effective;

(2) The governance-related roles and responsibilities of the Lead Agency, the State Advisory Council, each Participating State Agency, the State's Interagency Coordinating Council for part C of IDEA, and other partners, if any;

(3) The method and process for making different types of decisions (e.g., policy, operational) and resolving disputes; and

(4) The plan for when and how the State will involve representatives from Participating Programs, Early Childhood Educators or their representatives, parents and families, including parents and families of Children with High Needs, and other key stakeholders in the planning and implementation of the activities carried out under the grant;

(b) Demonstrating that the Participating State Agencies are strongly committed to the State Plan, to the governance structure of the grant, and to effective implementation of the State Plan, by including in the MOU or other binding agreement between the State and each Participating State Agency--

(1) Terms and conditions that reflect a strong commitment to the State Plan by each Participating State Agency, including terms and conditions designed to align and leverage the Participating State Agencies' existing funding to support the State Plan;

(2) "Scope-of-work" descriptions that require each Participating State Agency to implement all applicable portions of the State Plan and a description of efforts to maximize the number of Early Learning and Development Programs that become Participating Programs; and

(3) A signature from an authorized representative of each Participating State Agency; and

(c) Demonstrating commitment to the State Plan from a broad group of stakeholders that will assist the State in reaching the ambitious yet achievable goals outlined in response to selection criterion (A)(2)(a), including by obtaining--

(1) Detailed and persuasive letters of intent or support from Early Learning Intermediary Organizations, and, if applicable, local early learning councils; and

(2) Letters of intent or support from such other stakeholders as Early Childhood Educators or their representatives; the State's legislators; local community leaders; State or local school boards; representatives of private and faith-based early learning programs; other State and local leaders (e.g., business, community, tribal, civil rights, education association leaders); adult education and family literacy State and local leaders; family and community organizations (e.g., parent councils, nonprofit organizations, local foundations, tribal organizations, and community-based organizations); libraries and children's museums; health providers; and postsecondary institutions.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (A)(3)**

In developing this proposal, Puerto Rico used the ECAC and other planning meetings of the secretaries of key state agencies to develop the plan. All key agencies have provided the required signatures for supporting the plan and their role in the plan. PR's ECAC, housed in the Governor's office, will lead and manage the grant, building on their work over the past few years. The organizational chart in Appendix 14 illustrates the relationships among agencies, and the roles and responsibilities of the agencies are described in table A3-1. State Cabinet meetings with the Governor, Puerto Rico Early Childhood State Advisory Committee (PRSAC) meetings, and monthly reports of the participating state agencies will monitor progress on the state plan. A subcommittee of the ECAC will address dispute resolution. The involvement of a wide range of stakeholders is indicated, and participation will be encouraged by a committee of the ECAC. It is not clear how this dispute resolution process will be implemented, or if it would have the necessary authority to address serious issues within the state. The MOU's included in Appendices 3-12 (the same MOU provided in the announcement with signatures) and the Scope of Work in Appendix 13 detail the activities that each of the participating state agencies. The plan indicates each agency's activities, but there does not appear to be a high level of interagency coordination or collaboration. The commitment to young children in PR is indicated by letters of support from a wide range of stakeholders, including legislators, early childhood programs, family support organizations, private sector businesses, children's museums, universities and the Head Start Association. The table in A3-2 lists all of the letters of support, but it appears that the Head Start Association is the only intermediary organization that wrote a very brief letter. Other organizations such as the Puerto Rico Association for the Education of Young Children (AEYC), the Division for Early Childhood (DEC), the Child Care Resource and Referral Association (CCRRA), did not provide letters of support. Overall, the letters indicated a commitment to young children, but did not persuasively address a commitment to the state plan. The plan indicated that the criteria for this item are partially implemented, but did not provide information on specific activities, timelines, budgets, or how the plan would be implemented.

	Available	Score
<b>(A)(4) Developing a budget to implement and sustain the work of this grant.</b>	<b>15</b>	<b>5</b>

The extent to which the State Plan--

(a) Demonstrates how the State will use existing funds that support early learning and development from Federal, State, private, and local sources (e.g., CCDF; Title I and II of ESEA; IDEA; Striving Readers Comprehensive Literacy Program; State preschool; Head Start Collaboration and State Advisory Council funding; Maternal, Infant, and Early Childhood Home Visiting Program; Title V MCH Block Grant; TANF; Medicaid; child welfare services under Title IV (B) and (E) of the Social Security Act; Statewide Longitudinal Data System; foundation; other private funding sources) for activities and services that help achieve the outcomes in the State Plan, including how the quality set-asides in CCDF will be used;

(b) Describes, in both the budget tables and budget narratives, how the State will effectively and efficiently use funding from this grant to achieve the outcomes in the State Plan, in a manner that--

(1) Is adequate to support the activities described in the State Plan;

(2) Includes costs that are reasonable and necessary in relation to the objectives, design, and significance of the activities described in the State Plan and the number of children to be served; and

(3) Details the amount of funds budgeted for Participating State Agencies, localities, Early Learning Intermediary Organizations, Participating Programs, or other partners, and the specific activities to be implemented with these funds consistent with the State Plan, and demonstrates that a significant amount of funding will be devoted to the local implementation of the State Plan; and

(c) Demonstrates that it can be sustained after the grant period ends to ensure that the number and percentage of Children with High Needs served by Early Learning and Development Programs in the State will be maintained or expanded.

Scoring Rubric Used: **Quality**



**Comments on (A)(4)**

No narrative is included to address (A)(4)(a) and (A)(4)(c). Table (A)(4)-1 provides a picture of many resources that would support the proposal, although the contributions of Head Start and Early Head Start seem very low (37,000 children served in 2009-2010 and \$143,000 in funding), considering the number of children served in these programs and in comparison to the information provided in Table (A)(1)-4. The budgets and narratives for the grant proposal are detailed. The costs for some of the computer systems for the Governor's office appear to be high. The funding for the Department of Sports and Recreation also seems quite high and does not seem related to increasing access to quality early learning and development services for children with high needs. Funding is proposed for activities on a one time basis, such as set up costs for equipment or classrooms. For example, providing equipment for classrooms is not tied to increasing quality of services for children with high needs. A clear rationale for how that one time cost will address the goals of this proposal is not evident. Funding for training does not specify the content and does not appear to be tied directly to ECE workforce development. It is not clear how those funds will support increased access to high quality ELD programs for children with high needs. Funding is provided for staff at ACUDEN to pursue BA and MA degrees, but it is difficult to see how professional development for the early childhood education workforce is impacted. It does not appear that a significant amount of funding will be devoted to local implementation of the state plan. The rationale for how funding is allocated does not provide sufficient detail to determine if the funds are adequate and effectively used. The PR budget plan for implementing and sustaining the work of the grant is not specific in justifying costs that support the intent of the RTT-ELC. Key narrative sections are not provided, and the proposed uses of funding do not provide evidence of effective and efficient strategies to achieve the outcomes of the state plan.

**B. High-Quality, Accountable Programs**

	Available	Score
<b>(B)(1) Developing and adopting a common, statewide Tiered Quality Rating and Improvement System</b>	<b>10</b>	<b>2</b>
<p>The extent to which the State and its Participating State Agencies have developed and adopted, or have a High-Quality Plan to develop and adopt, a Tiered Quality Rating and Improvement System that--</p> <p>(a) Is based on a statewide set of tiered Program Standards that include--</p> <ul style="list-style-type: none"> <li>(1) Early Learning and Development Standards;</li> <li>(2) A Comprehensive Assessment System;</li> <li>(3) Early Childhood Educator qualifications;</li> <li>(4) Family engagement strategies;</li> <li>(5) Health promotion practices; and</li> <li>(6) Effective data practices;</li> </ul> <p>(b) Is clear and has standards that are measurable, meaningfully differentiate program quality levels, and reflect high expectations of program excellence commensurate with nationally recognized standards that lead to improved learning outcomes for children; and</p> <p>(c) Is linked to the State licensing system for Early Learning and Development Programs.</p>		

Scoring Rubric Used: **Quality and Implementation**

**Comments on (B)(1)**

Puerto Rico is in the initial stages of developing a Quality Rating and Improvement System. The QRIS has been developed and piloted, but does not include all of the elements of a Tiered QRIS, as specified in the RTT-ELC, and there is no indication that the PR QRIS will be revised to address all elements of a TQRIS. Early Learning and Development Standards have been developed and revised, and some health promotion practices are in place. Other components of a TQRIS that have not yet been developed, that will be planned and developed, include a Comprehensive Assessment System, Early Childhood Educator qualifications, family engagement standards, and effective data practices. The response provides a very general plan that does not include specific activities, timelines, responsibilities, or funding (the criteria for a high quality plan). A support system for program improvement is proposed that includes dissemination of information regarding the standards the QRIS, training, technical assistance, monitoring, and financial incentives and scholarships for professional development. The proposal does not clearly link the QRIS to licensing, nor indicate how the levels differentiate program quality. The ratings reflect partial implementation of a TQRIS and a very vague plan.

	Available	Score
<b>(B)(2) Promoting participation in the State's Tiered Quality Rating and Improvement System</b>	<b>15</b>	<b>2</b>

The extent to which the State has maximized, or has a High-Quality Plan to maximize, program participation in the State's Tiered Quality Rating and Improvement System by--

(a) Implementing effective policies and practices to reach the goal of having all publicly funded Early Learning and Development Programs participate in such a system, including programs in each of the following categories--

- (1) State-funded preschool programs;
- (2) Early Head Start and Head Start programs;
- (3) Early Learning and Development Programs funded under section 619 of part B of IDEA and part C of IDEA;
- (4) Early Learning and Development Programs funded under Title I of the ESEA; and
- (5) Early Learning and Development Programs receiving funds from the State's CCDF program;

(b) Implementing effective policies and practices designed to help more families afford high-quality child care and maintain the supply of high-quality child care in areas with high concentrations of Children with High Needs (e.g., maintaining or increasing subsidy reimbursement rates, taking actions to ensure affordable co-payments, providing incentives to high-quality providers to participate in the subsidy program); and

(c) Setting ambitious yet achievable targets for the numbers and percentages of Early Learning and Development Programs that will participate in the Tiered Quality Rating and Improvement System by type of Early Learning and Development Program (as listed in (B)(2)(a)(1) through (5) above).

Scoring Rubric Used: **Quality and Implementation**

**Comments on (B)(2)**

Puerto Rico has presented a plan to encourage program participation in the QRIS. The QRIS was piloted in 2010 with 100 volunteer programs from across the island. To implement the system major changes will be required to the state licensing system, including revisions of laws, policies, system reorganization and training of staff. Early Head Start and Head Start (EHS/HS) centers are not currently licensed, but will be required to be licensed by 2014. From the narrative, Child Care and Development Fund (CCDF) funded ELD programs are the other category of program that are licensed, and will be incorporated into the QRIS. It is not clear if there are state-funded preschool programs that are licensed. Part C, preschool special education programs funded by Sec. 619 funding, and ELD programs funded by Title 1 of ESEA are not covered. The plan does not specify any activities that will support families of children with high needs to afford high quality child care. The plan does target 25 communities of high need, but does not say what activities would take place in those communities. Education for families through workshops and public awareness campaigns on the importance of the early years are proposed. The targets set for the number and percentage of ELD programs that will participate in the QRIS seem quite low. From the baseline a 50% increase is suggested, and added each year. However, because so few programs are currently participating, the final targets in 2015 would only cover approximately 4-11% of ELD programs across the various systems. The targets do not seem ambitious, considering the great needs in this state. The TQRIS is partially developed, but the plan lacks specific information on goals, activities, timelines, responsibilities and budget.

	Available	Score
<b>(B)(3) Rating and monitoring Early Learning and Development Programs</b>	<b>15</b>	<b>1</b>

The extent to which the State and its Participating State Agencies have developed and implemented, or have a High-Quality Plan to develop and implement, a system for rating and monitoring the quality of Early Learning and Development Programs participating in the Tiered Quality Rating and Improvement System by--

(a) Using a valid and reliable tool for monitoring such programs, having trained monitors whose ratings have an acceptable level of inter-rater reliability, and monitoring and rating the Early Learning and Development Programs with appropriate frequency; and

(b) Providing quality rating and licensing information to parents with children enrolled in Early Learning and Development Programs (e.g., displaying quality rating information at the program site) and making program quality rating data, information, and licensing history (including any health and safety violations) publicly available in formats that are easy to understand and use for decision making by families selecting Early Learning and Development Programs and families whose children are enrolled in such programs.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (B)(3)**

Puerto Rico's plan for rating and monitoring ELD programs is based on the use of mentors to support the development of quality in ELD programs in PR. The programs would conduct a self assessment and receive support from mentors 3 times a year to support development of their programs. Information on the PR QRIS tool does not include data on the reliability or validity of the tool, nor of the monitoring process. Mentors would be trained prior to the visits that are conducted 3 times a year. The plan does not specify who would do the training. It is also unclear how the roles of mentor and monitor are combined in this process. The PR plan indicates that all licensed ELD programs would receive training on the QRIS and develop an improvement plan. By 2015 all licensed programs be required to display their quality ratings at their site. In order to be licensed, programs would need to meet the basic health and safety standards and other requirements to achieve a 1 star rating. The plan does not address providing information on licensing history or health and safety violations, but perhaps since this system is new, that information is not available. Several opportunities for sharing information on the PR QRIS are proposed. Programs and families in PR would have access to a web site. Orientations on the QRIS, a media campaign, and consumer education for families receiving CCDF funded ELD programs would also be available. The elements of this component of the state system are minimally implemented, and the response to this item does not indicate how the plan will be implemented.

	Available	Score
<b>(B)(4) Promoting access to high-quality Early Learning and Development Programs for Children with High Needs</b>	20	1

The extent to which the State and its Participating State Agencies have developed and implemented, or have a High-Quality Plan to develop and implement, a system for improving the quality of the Early Learning and Development Programs participating in the Tiered Quality Rating and Improvement System by--

(a) Developing and implementing policies and practices that provide support and incentives for Early Learning and Development Programs to continuously improve (e.g., through training, technical assistance, financial rewards or incentives, higher subsidy reimbursement rates, compensation);

(b) Providing supports to help working families who have Children with High Needs access high-quality Early Learning and Development Programs that meet those needs (e.g., providing full-day, full-year programs; transportation; meals; family support services); and

(c) Setting ambitious yet achievable targets for increasing--

(1) The number of Early Learning and Development Programs in the top tiers of the Tiered Quality Rating and Improvement System; and

(2) The number and percentage of Children with High Needs who are enrolled in Early Learning and Development Programs that are in the top tiers of the Tiered Quality Rating and Improvement System.

Scoring Rubric Used: **Quality and Implementation**

#### Comments on (B)(4)

Puerto Rico's plans for promoting access to high quality ELD programs for children with high needs is in its initial stages. The policies and practices that support ELD programs to continuously improve, based on the QRIS require extensive systems building and reorganization. ACUDEN, the lead agency, is planning a system reorganization to create a QRIS Unit. This new QRIS Unit will develop incentives, monitoring, and technical assistance. The PR plan is to provide mentors for licensed programs to bring them into high quality status within a year. Competitive scholarships are proposed to be offered through the Governor's Office, and judged by the PR ECAC members. No plans are included for linking quality to reimbursement rates or compensation. Although incentives are mentioned, they are not specified. Strategies for supporting working families of children with high needs in only addressed through access to a website designed to provide information to families. A draft web site and data system have been developed. The targets for increasing the number of ELD programs in the top tier of the QRIS system set by Puerto Rico in this plan appear to only target the 100 programs that participated in the pilot program. It is not clear how the 25 target high need communities will be involved. The targets for increasing the number of children with high needs enrolled in high quality ELD programs are set at between 5% and 8%, with the exception of enrolling in private programs, 20% targeted to be in the top tiers of quality. The larger increases in quality in private ELD programs does not seem to support working families of children with high needs afford or access high quality care. The next steps of PR include monitoring all programs. Since no monitoring is in place now, this appears to be a very large undertaking. The Table in (B)(4)(b)(1) only represents the 100 pilot programs, so it is unclear what the plans or targets are for the many remaining PR ELD programs. The strategy proposed for addressing the needs of children with high needs is to build capacity for high quality ELD programs in the 25 highest need communities in PR. No information is provided on how that will occur.

	Available	Score
<b>(B)(5) Validating the effectiveness of the State Tiered Quality Rating and Improvement System.</b>	15	1

The extent to which the State has a High-Quality Plan to design and implement evaluations--working with an independent evaluator and, when warranted, as part of a cross-State evaluation consortium--of the relationship between the ratings generated by the State's Tiered Quality Rating and Improvement System and the learning outcomes of children served by the State's Early Learning and Development Programs by--

(a) Validating, using research-based measures, as described in the State Plan (which also describes the criteria that the State used or will use to determine those measures), whether the tiers in the State's Tiered Quality Rating and Improvement System accurately reflect differential levels of program quality; and

(b) Assessing, using appropriate research designs and measures of progress (as identified in the State Plan), the extent to which changes in quality ratings are related to progress in children's learning, development, and school readiness.

Scoring Rubric Used: **Quality**

**Comments on (B)(5)**

The validation of the effectiveness of the PR TQRIS is addressed in a very general way. The TQRIS defined by the RTT-ELC is much more extensive than the QRIS that has been developed by PR in 2010. The validation of the content of the PR QRIS, Baby Steps, is being conducted through focus groups of experts who have used the instrument and programs participating in the pilot. However, the validity of the instrument in differentiating levels of program quality has not been established. An evaluation study, using an independent evaluator, is proposed. The plan does not specify the intended design, other than looking at the 100 volunteer classrooms that participated in the pilot. Given the large number of ELD programs in PR, it would be helpful to have a larger sample that is not a volunteer group. The PR response to this item is very brief and general, with no specific activities, timelines, responsibilities, nor budget as included in the RTT-ELC definition of a high quality plan.

**Focused Investment Areas (C), (D), and (E)**

Each State must address in its application--

- (1) Two or more of the selection criteria in Focused Investment Area (C);
- (2) One or more of the selection criteria in Focused Investment Area (D); and
- (3) One or more of the selection criteria in Focused Investment Area (E)

The total available points for each Focused Investment Area will be divided by the number of selection criteria that the applicant chooses to address in that area, so that each selection criterion is worth the same number of points.

**C. Promoting Early Learning and Development Outcomes for Children**

The total available points that an applicant may receive for selection criteria (C)(1) through (C)(4) is 60. The 60 points will be divided by the number of selection criteria that the applicant chooses to address so that each selection criterion is worth the same number of points. For example, if the applicant chooses to address all four selection criteria under this Focused Investment Area, each criterion will be worth up to 15 points. If the applicant chooses to address two selection criteria, each criterion will be worth up to 30 points.

The applicant must address at least two of the selection criteria within Focused Investment Area (C), which are as follows:

	Available	Score
<b>(C)(1) Developing and using statewide, high-quality Early Learning and Development Standards.</b>	15	7

The extent to which the State has a High-Quality Plan to put in place high-quality Early Learning and Development Standards that are used statewide by Early Learning and Development Programs and that--

(a) Includes evidence that the Early Learning and Development Standards are developmentally, culturally, and linguistically appropriate across each age group of infants, toddlers, and preschoolers, and that they cover all Essential Domains of School Readiness;

(b) Includes evidence that the Early Learning and Development Standards are aligned with the State's K-3 academic standards in, at a minimum, early literacy and mathematics;

(c) Includes evidence that the Early Learning and Development Standards are incorporated in Program Standards, curricula and activities, Comprehensive Assessment Systems, the State's Workforce Knowledge and Competency Framework, and professional development activities; and

(d) The State has supports in place to promote understanding of and commitment to the Early Learning and Development Standards across Early Learning and Development Programs.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (C)(1)**

Puerto Rico has developed and revised statewide ELD Standards. The standards are based on NAEYC and PR AEYC recommendations and other national standards. The standards cover the birth to five age range and reflect the domains of school readiness, with the exception of the "approach to learning" category specified in the RTT-ELC Essential Domains of School Readiness. It does include a category of "creative development" and it is not clear that these are the same domains. The proposal indicates that standards were aligned with the PR Department of Education K-12 standards in 2010, although the document in Appendix 50 was missing. PR's proposal states that most ELD programs use early childhood curricula that align with the standards, particularly in Head Start, state Pre-K preschools, and CCDF funded ELD programs. Other aspects of the system, as defined by the RTT-ELC, are not currently in place (Programs Standards, Comprehensive Assessment System, Workforce Knowledge and Competency Framework). Professional development activities that relate to the ELDS are being offered, and the state plan for development of the Workforce Framework will be tied to the ELDS. The PR proposal includes several mechanisms for promoting understanding of and commitment to the ELDS across the various systems. One plan is for a multidisciplinary training team, and another describes the TAP program that provides mentoring and training for Family Child Care Providers as part of the licensing process. This element of the State system is partially implemented. The plan is vague and does not specify the activities, timelines, budgets, roles and responsibilities as required in the RTT-ELC definition of a high quality plan.

	Available	Score
<b>(C)(2) Supporting effective uses of Comprehensive Assessment Systems.</b>	15	2

The extent to which the State has a High-Quality Plan to support the effective implementation of developmentally appropriate Comprehensive Assessment Systems by--

- (a) Working with Early Learning and Development Programs to select assessment instruments and approaches that are appropriate for the target populations and purposes;
- (b) Working with Early Learning and Development Programs to strengthen Early Childhood Educators' understanding of the purposes and uses of each type of assessment included in the Comprehensive Assessment Systems;
- (c) Articulating an approach for aligning and integrating assessments and sharing assessment results, as appropriate, in order to avoid duplication of assessments and to coordinate services for Children with High Needs who are served by multiple Early Learning and Development Programs; and
- (d) Training Early Childhood Educators to appropriately administer assessments and interpret and use assessment data in order to inform and improve instruction, programs, and services.

Scoring Rubric Used: **Quality and Implementation**

#### Comments on (C)(2)

The Puerto Rico proposal reflects only a minimal implementation of a few elements of a comprehensive assessment system. PR has chosen the Ages and Stages Questionnaire as their screening instrument and has provided training on the ASQ and the ELD Standards. However, this is the only element of the Comprehensive Assessment System (CAS) that is specified. The response does not indicate an understanding of the elements of a CAS (no mention is made of formative assessment, environmental ratings or adult-child interactions). Because only one screening instrument is proposed, sharing of information across systems and programs is facilitated. However, it does not reflect the various purposes and uses of assessment instruments. To rely only on a screening instrument for the CAS does not seem to be an effective strategy. The proposal indicates that the ECAC would assist in aligning assessment systems for the state.

	Available	Score
<b>(C)(3) Identifying and addressing the health, behavioral, and developmental needs of Children with High Needs to improve school readiness.</b>	15	1

The extent to which the State has a High-Quality Plan to identify and address the health, behavioral, and developmental needs of Children with High Needs by--

- (a) Establishing a progression of standards for ensuring children's health and safety; ensuring that health and behavioral screening and follow-up occur; and promoting children's physical, social, and emotional development across the levels of its Program Standards;
- (b) Increasing the number of Early Childhood Educators who are trained and supported on an on-going basis in meeting the health standards;
- (c) Promoting healthy eating habits, improving nutrition, expanding physical activity; and
- (d) Leveraging existing resources to meet ambitious yet achievable annual targets to increase the number of Children with High Needs who--
  - (1) Are screened using Screening Measures that align with the Medicaid Early Periodic Screening, Diagnostic and Treatment benefit (see section 1905(r)(5) of the Social Security Act) or the well-baby and well-child services available through the Children's Health Insurance Program (42 CFR 457.520), and that, as appropriate, are

consistent with the Child Find provisions in IDEA (see sections 612(a)(3) and 635(a)(5) of IDEA);

(2) Are referred for services based on the results of those screenings, and where appropriate, received follow-up; and

(3) Participate in ongoing health care as part of a schedule of well-child care, including the number of children who are up to date in a schedule of well-child care.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (C)(3)**

The PR proposal narrative does not address strategies for identifying and addressing the health, behavioral and developmental needs of children with high needs to improve school readiness. Table (C)(3)(d) is difficult to interpret because no narrative is available to explain the data. One piece of data that was suggested as a target is that 3.5% of children screened who are referred for services receive follow up. This would be of concern as a baseline – not a target for performance. Minimal evidence is provided that PR has a progression of standards for identifying and addressing the health, behavioral and developmental needs of children. Table (A)(1)-8 does outline elements of health promotion practices that are currently required in the state, and PR indicates that state funded preschools, Head Start and CCDF meet the requirements. Pediatric screenings are described elsewhere in the proposal and in Appendix 47. The proposal does not discuss ongoing health well-child health care (3) or healthy eating and nutrition (b).

	Available	Score
<b>(C)(4) Engaging and supporting families.</b>	<b>15</b>	<b>3</b>

The extent to which the State has a High-Quality Plan to provide culturally and linguistically appropriate information and support to families of Children with High Needs in order to promote school readiness for their children by--

(a) Establishing a progression of culturally and linguistically appropriate standards for family engagement across the levels of its Program Standards, including activities that enhance the capacity of families to support their children's education and development;

(b) Increasing the number and percentage of Early Childhood Educators trained and supported on an on-going basis to implement the family engagement strategies included in the Program Standards; and

(c) Promoting family support and engagement statewide, including by leveraging other existing resources such as through home visiting programs, other family-serving agencies, and through outreach to family, friend, and neighbor caregivers.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (C)(4)**

PR has a number of resources for family engagement as documented in Appendix 51. However, PR does not have standards for family engagement across the many systems to provide support to families of children with high needs. The PR proposal suggests building on the Head Start, child care, and resource and referral services for family engagement, as a basis for developing standards for family engagement. The PR plan is for a cross-system group to develop the standards and legislation that will apply across all ELD programs in PR. The narrative provides information on the types of training and support provided and the number of people to be trained. No baseline data or percentages are provided. The plan to promote family engagement state-wide includes linkages with other family-serving organizations, such as substance abuse and child abuse services, as well as family, friend and neighbor caregivers. PR's plan for family engagement is not specific, rather it provides general statements that the state will develop the standards and provide training. The rating indicates a minimal implementation of standards for family engagement.

**D. A Great Early Childhood Education Workforce**

*The total points that a State may earn for selection criteria (D)(1) and (D)(2) is 40. The 40 points will be divided by the number of selection criteria that the applicant chooses to address so that each selection criterion is worth the same number of points. For example, if the applicant chooses to address both selection criteria under this Focused Investment Area, each criterion will be worth up to 20 points. If the applicant chooses to address one selection criterion, the criterion will be worth up to 40 points.*

*The applicant must address at least one of the selection criteria within Focused Investment Area (D), which are as follows:*

	Available	Score
<b>(D)(1) Developing a Workforce Knowledge and Competency Framework and a progression of credentials.</b>	<b>20</b>	<b>4</b>

The extent to which the State has a High-Quality Plan to--

- (a) Develop a common, statewide Workforce Knowledge and Competency Framework designed to promote children's learning and development and improve child outcomes;
- (b) Develop a common, statewide progression of credentials and degrees aligned with the Workforce Knowledge and Competency Framework; and
- (c) Engage postsecondary institutions and other professional development providers in aligning professional development opportunities with the State's Workforce Knowledge and Competency Framework.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (D)(1)**

PR has proposed a very general plan for developing a workforce knowledge and competency framework building on the existing coursework and professional development resources. The framework will be developed by a Early Childhood Workforce Institute (ECWI) (to be developed) that will be charged with developing the competencies for the framework. Goals for the Institute are included in the proposal, but specific activities, timelines, budget, roles and responsibilities are not detailed. The progression of credentials and degrees will incorporate the Child Development Associate as one of the foundation credentials for the system. The Baby Steps, QRIS, also include items on staff competencies in the tool. The current training programs in early childhood, early childhood special education and early intervention will provide support and expertise for developing the system. The PR plan is in the initial stages of implementation.

	Available	Score
<b>(D)(2) Supporting Early Childhood Educators in improving their knowledge, skills, and abilities.</b>	20	4

The extent to which the State has a High-Quality Plan to improve the effectiveness and retention of Early Childhood Educators who work with Children with High Needs, with the goal of improving child outcomes by--

- (a) Providing and expanding access to effective professional development opportunities that are aligned with the State's Workforce Knowledge and Competency Framework;
- (b) Implementing policies and incentives (e.g., scholarships, compensation and wage supplements, tiered reimbursement rates, other financial incentives, management opportunities) that promote professional improvement and career advancement along an articulated career pathway that is aligned with the Workforce Knowledge and Competency Framework, and that are designed to increase retention;
- (c) Publicly reporting aggregated data on Early Childhood Educator development, advancement, and retention; and
- (d) Setting ambitious yet achievable targets for--
  - (1) Increasing the number of postsecondary institutions and professional development providers with programs that are aligned to the Workforce Knowledge and Competency Framework and the number of Early Childhood Educators who receive credentials from postsecondary institutions and professional development providers that are aligned to the Workforce Knowledge and Competency Framework; and
  - (2) Increasing the number and percentage of Early Childhood Educators who are progressing to higher levels of credentials that align with the Workforce Knowledge and Competency Framework.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (D)(2)**

The PR plan for supporting early childhood educators in improving their knowledge, skills, and abilities is based on a professional development system that does not yet have a Workforce Knowledge and Competency Framework. The PR plan addresses increases in CDA certification, but does not discuss how professional development opportunities will be aligned with the Framework. There is also no discussion of workforce retention. Professional development will be supported through scholarships, which will be administered through the Governor's office and the ECAC. Scholarships will support staff in completing Child Development Associate (CDA) certificates or other EC, Early Childhood Special Education (ECSE), or Early Intervention (EI) certification available in current training programs. The content of the training will be linked to needs identified as part of the QRIS observations. PR's plan is focused on building the system – using the existing resources as a foundation. The plan does not specify how the professional development would be provided – and does not discuss how inservice training would be incorporated into the systems. Three steps will be included in the progression of certification – beginner, intermediate and advanced. No data system is in place, but the proposed ECWI will develop a career ladder as part of their responsibilities. The target for aligning university certification with the Framework is for 100% of the programs to be aligned by 2015. This appears to be a feasible goal, since there are so few preservice EC training programs in PR. Targets for increases in the number and percentages of ECE who receive higher credentials only address the number of staff achieving a CDA. This appears to be achievable, but not ambitious. It was difficult to determine how ambitious or achievable the targets for this section he, given the lack of specific information. PR's plan is only minimally implemented and does not meet the criteria for a high quality

plan.

### E. Measuring Outcomes and Progress

The total points an applicant may earn for selection criteria (E)(1) and (E)(2) is 40. The 40 points will be divided by the number of selection criteria that the applicant chooses to address so that each selection criterion is worth the same number of points. For example, if the applicant chooses to address both selection criteria under this Focused Investment Area, each criterion will be worth up to 20 points. If the applicant chooses to address one selection criterion, the criterion will be worth up to 40 points.

The applicant must address at least one of the selection criteria within Focused Investment Area (E), which are as follows:

	Available	Score
<b>(E)(1) Understanding the status of children's learning and development at kindergarten entry.</b>	20	4
<p>The extent to which the State has a High-Quality Plan to implement, independently or as part of a cross-State consortium, a common, statewide Kindergarten Entry Assessment that informs instruction and services in the early elementary grades and that--</p> <p>(a) Is aligned with the State's Early Learning and Development Standards and covers all Essential Domains of School Readiness;</p> <p>(b) Is valid, reliable, and appropriate for the target population and for the purpose for which it will be used, including for English learners and children with disabilities;</p> <p>(c) Is administered beginning no later than the start of school year 2014-2015 to children entering a public school kindergarten; States may propose a phased implementation plan that forms the basis for broader statewide implementation;</p> <p>(d) Is reported to the Statewide Longitudinal Data System, and to the early learning data system, if it is separate from the Statewide Longitudinal Data System, as permitted under and consistent with the requirements of Federal, State, and local privacy laws; and</p> <p>(e) Is funded, in significant part, with Federal or State resources other than those available under this grant, (e.g., with funds available under section 6111 or 6112 of the ESEA).</p> <p>Scoring Rubric Used: <b>Quality and Implementation</b></p> <p><b>Comments on (E)(1)</b></p> <p>Puerto Rico reports that it has developed and aligned the Kindergarten Entry Assessment to the ELD standards. The Teacher Observation Scale (PR's KEA) has been used as a screening measure for the past 10 years. Although the proposal states that the KEA covers all essential domains of school readiness, social emotional and physical development domains were not evident in information presented on the tool. The screening is conducted during the first month of school and reported to the PR Dept of Ed. One teacher in each district supervises the administration. Validation of the tool occurs through a discussion among teachers, families and social workers. This appears to be a weak process for establishing reliability and validity of the instrument. Table 1 and Table 2 in this section illustrate data from a sample of kindergarten observation scores, showing children entering kindergarten with significant delays in Cognitive and Math concepts. A formative assessment progress report was developed in 2009-2010, and data showed children achieving all goals in November of that same year. The tables were confusing, as it looked as though they were administered only a few months apart and children made significant gains in that brief time period. It also appears that the data is from two different instruments. PR describes their intent to use the assessment data from these instruments to support and improve teacher instructional practices. PR is proposing development of a data system to link the KEA to the PR Department of Education data system using \$2.5 M of funding from the RTT-ELC. PR has some of the elements of the plan for KEA, but the plan lacks specificity.</p>		

	Available	Score
<b>(E)(2) Building or enhancing an early learning data system to improve instruction, practices, services, and policies.</b>	20	12
<p>The extent to which the State has a High-Quality Plan to enhance the State's existing Statewide Longitudinal Data System or to build or enhance a separate, coordinated, early learning data system that aligns and is interoperable with the Statewide Longitudinal Data System, and that either data system--</p> <p>(a) Has all of the Essential Data Elements;</p> <p>(b) Enables uniform data collection and easy entry of the Essential Data Elements by Participating State Agencies and Participating Programs;</p> <p>(c) Facilitates the exchange of data among Participating State Agencies by using standard data structures, data formats, and data definitions such as Common Education Data Standards to ensure interoperability among the</p>		



various levels and types of data:

(d) Generates information that is timely, relevant, accessible, and easy for Early Learning and Development Programs and Early Childhood Educators to use for continuous improvement and decision making; and

(e) Meets the Data System Oversight Requirements and complies with the requirements of Federal, State, and local privacy laws.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (E)(2)**

Puerto Rico's plan for building or enhancing an early learning data system to improve instruction, practices, services and policies proposes building both an early learning data system and a Statewide Longitudinal Data System. The plan proposes that all of the Essential Data Elements will be put in place and linked to the State Longitudinal Data System (SLDS) which is in the process of being developed. The data collection and entry process will be designed in tandem with the SLDS, and also using the National Information Exchange Model (NIEM) and information from other states to guide the development of the data system. PR's proposal indicates that they will make information generated by the system useful to programs and ECE to support informed decision making. Data System Oversight Requirements are also addressed in a collaborative manner between the RTT-ELC and the development of the SLDS.

	Available	Score
<b>Total Points Available for Selection Criteria</b>	<b>280</b>	<b>79</b>

**Priorities**

Competitive Preference Priorities

	Available	Score
<b>Competitive Preference Priority 2: Including all Early Learning and Development Programs in the Tiered Quality Rating and Improvement System</b>	<b>10</b>	<b>4</b>

Competitive Preference Priority 2 is designed to increase the number of children from birth to kindergarten entry who are participating in programs that are governed by the State's licensing system and quality standards, with the goal that all licensed or State-regulated programs will participate. The State will receive points for this priority based on the extent to which the State has in place, or has a High-Quality Plan to implement no later than June 30, 2015--

(a) A licensing and inspection system that covers all programs that are not otherwise regulated by the State and that regularly care for two or more unrelated children for a fee in a provider setting; provided that if the State exempts programs for reasons other than the number of children cared for, the State may exclude those entities and reviewers will score this priority only on the basis of non-excluded entities; and

(b) A Tiered Quality Rating and Improvement System in which all licensed or State-regulated Early Learning and Development Programs participate.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (P)(2)**

Puerto Rico's plan for including all learning and development programs is in the beginning stages. As the TQRIS is being revised, participation in the system will be voluntary. PR does not have a licensing system in place, but plans to address bringing Family Child Care into licensing through a program called PAT, where programs would receive technical assistance and mentoring to improve the quality of their programs. The proposal refers to a Family, Friends, and Neighbor Strategic Plan, but it is not clear how that plan relates to this proposal. Eventually all programs are targeted to be part of licensing, which would bring them to at least a one star in the QRIS. However it is not clear how this will be accomplished. It also seems that Family Child Care (FCC) is assumed to be the same as FFN care, which was confusing. PR has developed a QRIS (Baby Steps) that include some of the aspects of a TQRIS: the ELD standards, and health promotion practices. The CAS, ECE qualifications, family engagement, and data practices need to be augmented to meet the criteria PR has proposed improvements to the TQRIS, but it does not include goals or timelines for this component of the program.

Priorities

	Available	Yes/No
<b>Competitive Preference Priority 3: Understanding the Status of Children's Learning and Development at Kindergarten Entry</b>	<b>0 or 10</b>	<b>No</b>

To meet this priority, the State must, in its application--

(a) Demonstrate that it has already implemented a Kindergarten Entry Assessment that meets selection criterion (E)(1) by indicating that all elements in Status Table (A)(1)-12 are met; or

(b) Address selection criterion (E)(1) and earn a score of at least 70 percent of the maximum points available for that criterion.

**Comments on (P)(3)**

PR's proposal did not meet either criteria for this component of the system. The data in Table (A)(1)-12 indicate that there are missing elements, and the score for this item in (E)(1) was less than 70%.

**Absolute Priority**

	<b>Met? Yes/No</b>
<b>Absolute Priority - Promoting School Readiness for Children with High Needs.</b>	<b>No</b>
<p>To meet this priority, the State's application must comprehensively and coherently address how the State will build a system that increases the quality of Early Learning and Development Programs for Children with High Needs so that they enter kindergarten ready to succeed.</p> <p>The State's application must demonstrate how it will improve the quality of Early Learning and Development Programs by integrating and aligning resources and policies across Participating State Agencies and by designing and implementing a common, statewide Tiered Quality Rating and Improvement System. In addition, to achieve the necessary reforms, the State must make strategic improvements in those specific reform areas that will most significantly improve program quality and outcomes for Children with High Needs. Therefore, the State must address those criteria from within each of the Focused Investment Areas (sections (C) Promoting Early Learning and Development Outcomes for Children, (D) A Great Early Childhood Education Workforce, and (E) Measuring Outcomes and Progress) that it believes will best prepare its Children with High Needs for kindergarten success.</p>	
<b>Comments on Absolute Priority</b>	
<p>Puerto Rico's proposal for the ELC-RTT did not meet the criteria for the absolute priority of promoting school readiness for children with high needs. The proposal was not written or organized to provide a coherent plan for how the state will build a system to increase the quality of ELD programs for children with high needs. The PR plan builds on existing resources, and proposes coordination of services across systems, but few specific activities were described to explain how this would happen. The TQRIS is in development. Although a QRIS has been piloted and ELD standards have been developed, it does not include a CAS, ECE quality, family engagement standards, nor effective data practices. The TQRIS has not been validated to differentiate quality levels. The current QRIS is not linked to licensing. The key elements of promoting ELS Outcomes for children (EL Standards; CAS; health, behavior and developmental supports; and family engagement) are at the beginning stages of implementation. The ECE Workforce development is also in its beginning stages. The area of measuring outcomes and progress through the KEA is partially implemented, but needs some revisions. The plans for the data system will be linked with the State Longitudinal Data System. The Focused Investment areas will need significant strategic planning and thoughtful implementation to improve the quality of ELD programs and prepare children with high needs for school success. The plans for development of these elements are not specific, often lacking clear goals, activities, timelines, responsibilities, and resources. The budget and activities proposed are not clearly tied to improving program quality and outcomes for children with high needs.</p>	



Race to the Top – Early Learning Challenge Review



Technical Review Form Page

Application # PR-5032

Peer Reviewer: [Redacted]
Lead Monitor: [Redacted]
Support Monitor: [Redacted]
Application Status: Reviewed
Date/Time: 11/17/2011 - 11:28 PM

CORE AREAS (A) and (B)

States must address in their application all of the selection criteria in the Core Areas.

A. Successful State Systems

Table with 3 columns: Criteria, Available, Score. Row 1: (A)(1) Demonstrating past commitment to early learning and development, 20, 20. Includes detailed description of criteria (a) through (d).

Scoring Rubric Used: Quality

Comments on (A)(1)

Puerto Rico (PR) completed all charts (A)(1)1-13 which is indicative of a comprehensive assessment of the current state of pre-school within a culture that values the family and young children. A 1 a PR has established an infrastructure that will ensure quality early childhood experiences. The financial investments in children with high needs are clearly indicative of the state's intention to provide high quality learning experiences. The state has prepared for ELC by using the American Recovery and Reinvestment Act (ARRA) funds to develop the infrastructure. The Administration for the Integral Child Care and Development (ACUDEN) is the lead agency for the Early Learning and Development programs. ACUDEN used the ARRA funds for the provision of child care and development services, with priority on high needs children. ARRA funds also increase access to high needs children through subsidy programs. There is an increase of over one million dollars from FY 10 to FY 11. Supplemental state spending on Head Start and Early Head Start supports the state's intent to promote preschool education. The spending levels on preschool education are significant in a state with large populations of high poverty/high needs communities. A1 b The completed tables present convincing evidence that the state is targeting children with high needs. PR has increased services to preschool children with high needs through the state funded preschool, Early Head Start and Head Start. A1 c The government is following suit with the passage of Public Law 93 which declares that all children are entitled to an education that includes higher levels of intellectual achievement. In 2008, PR passed Act 193 for the Integral Protection of young children. Additional legislation includes provisions that empower municipalities to implement or make accessible childcare program to children and families in their jurisdictions. ACUDEN includes a unique strategy at the state level - Respite Care and Family Support Centers to prevent child abuse and neglect. A1 d PR has developed Early Learning Standards that cover all of the domains required by the ELC. The evidence for Approaches to Learning, while not specifically addressed in the standards document is addressed in other sections of the grant. Additionally, the instruction on standards for pre-school in holistic environments indicates the intent of the state to address Approaches to Learning. The state has proposed Health promotion standards through licensing, and further screenings through the medical community. Early Learning Standards have been developed and one of the activities proposed in this application includes the alignment with training and required alignment to adopted

curriculum. PR presents convincing evidence of a wide array of family engagement strategies in this section of the plan. Specific examples of high engagement practice are the inclusion of parents in curriculum decisions and the family centered early intervention practices. Family engagement practice also includes a focus on father's participation in the education and development of children in the early years. Character Counts and Healthy, Happy, Successful children a series of education seminars for parents which provides parents with informational materials to be used at home. Professional Development is currently provided by ACUDEN. Personnel development is a part of CCDF efforts to provide information about early learning and development process to Early Childhood Educators (ECE) and child care workers. A parent engagement agency is devoted to assisting in the development of quality learning environments. This agency provides mentoring twice a month and targets Family Day Care Centers. In an application, where family care is a large part of the childcare provision, a partnership with this agency constitutes a strength in the professional development currently in place. The Child Care Resource and Referral Center, CENTRANA, is the established Resource and Referral agency. It supports center staff with training and assists parents with training and location of childcare centers. It is an active agency in this partnership, which strengthens this proposal. CENTRANA leads the collaboration efforts between counties and the state to provide training to parent and teachers, provides a lending library of educational materials, and delivers technical assistance on use of materials, and supports a website for parent and teacher use. A Quality Rating and Improvement System (QRIS) pilot of 100 centers in (Early Head Start (EHS), Head Start (HS), Child Care Development Fund (CCDF), Private centers, PRE-K and K is currently taking place. This effort is strong in that Puerto Rico has begun a process of establishing the criteria in the tiers quality in the provision of childcare services. This section clearly describes Puerto Rico's current efforts in providing early childhood services in the state. Collaboration between agencies has ensured wise use of ARRA funds to support an infrastructure and provide a strong foundation to support the use of ELC funds. Puerto Rico is awarded full points for the high quality of the assessment of current ELD programs in the state.

	Available	Score
<b>(A)(2) Articulating the State's rationale for its early learning and development reform agenda and goals.</b>	20	5

The extent to which the State clearly articulates a comprehensive early learning and development reform agenda that is ambitious yet achievable, builds on the State's progress to date (as demonstrated in selection criterion (A)(1)), is most likely to result in improved school readiness for Children with High Needs, and includes--

- (a) Ambitious yet achievable goals for improving program quality, improving outcomes for Children with High Needs statewide, and closing the readiness gap between Children with High Needs and their peers;
- (b) An overall summary of the State Plan that clearly articulates how the High-Quality Plans proposed under each selection criterion, when taken together, constitute an effective reform agenda that establishes a clear and credible path toward achieving these goals; and
- (c) A specific rationale that justifies the State's choice to address the selected criteria in each Focused Investment Area (C), (D), and (E), including why these selected criteria will best achieve these goals.

Scoring Rubric Used: **Quality**

**Comments on (A)(2)**

A2 a It is not clear how the goals were established in the proposal. A review of the document seems to indicate that the Focused Investment Area selection is a statement of the projects goals. A weakness in this section of the proposal is the absence of timelines and responsible agencies for meeting the goals. In the absence of explicitly stated goals, benchmarks, and timelines it is not possible to judge the ambitious or achievable criteria required in this section. A2 b The state has not provided clear evidence of a plan in achieving the goals. The state indicates that the process of self evaluation has provided the means to establish priorities. The priorities are not clearly described. A significant weakness in this area is the QRIS rating and the lack of discussion of the proposed changes in the continuing development. A 2 c – This proposal does not describe plans for a reform agenda. The discussion is centered around past activities and the activities that are planned to meet the "missing pieces" in assessment, health practices, family engagement, assessment, workforce training and data collection. Puerto Rico is awarded 5points for this section due to the inadequate discussion of how the goals are to be met.

	Available	Score
<b>(A)(3) Aligning and coordinating early learning and development across the State</b>	10	5

The extent to which the State has established, or has a High-Quality Plan to establish, strong participation and commitment in the State Plan by Participating State Agencies and other early learning and development stakeholders by--

- (a) Demonstrating how the Participating State Agencies and other partners, if any, will identify a governance structure for working together that will facilitate interagency coordination, streamline decision making, effectively allocate resources, and create long-term sustainability and describing--
  - (1) The organizational structure for managing the grant and how it builds upon existing interagency governance structures such as children's cabinets, councils, and commissions, if any already exist and are effective;

(2) The governance-related roles and responsibilities of the Lead Agency, the State Advisory Council, each Participating State Agency, the State's Interagency Coordinating Council for part C of IDEA, and other partners, if any;

(3) The method and process for making different types of decisions (e.g., policy, operational) and resolving disputes; and

(4) The plan for when and how the State will involve representatives from Participating Programs, Early Childhood Educators or their representatives, parents and families, including parents and families of Children with High Needs, and other key stakeholders in the planning and implementation of the activities carried out under the grant;

(b) Demonstrating that the Participating State Agencies are strongly committed to the State Plan, to the governance structure of the grant, and to effective implementation of the State Plan, by including in the MOU or other binding agreement between the State and each Participating State Agency--

(1) Terms and conditions that reflect a strong commitment to the State Plan by each Participating State Agency, including terms and conditions designed to align and leverage the Participating State Agencies' existing funding to support the State Plan;

(2) "Scope-of-work" descriptions that require each Participating State Agency to implement all applicable portions of the State Plan and a description of efforts to maximize the number of Early Learning and Development Programs that become Participating Programs; and

(3) A signature from an authorized representative of each Participating State Agency; and

(c) Demonstrating commitment to the State Plan from a broad group of stakeholders that will assist the State in reaching the ambitious yet achievable goals outlined in response to selection criterion (A)(2)(a), including by obtaining--

(1) Detailed and persuasive letters of intent or support from Early Learning Intermediary Organizations, and, if applicable, local early learning councils; and

(2) Letters of intent or support from such other stakeholders as Early Childhood Educators or their representatives; the State's legislators; local community leaders; State or local school boards; representatives of private and faith-based early learning programs; other State and local leaders (e.g., business, community, tribal, civil rights, education association leaders); adult education and family literacy State and local leaders; family and community organizations (e.g., parent councils, nonprofit organizations, local foundations, tribal organizations, and community-based organizations); libraries and children's museums; health providers; and postsecondary institutions.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (A)(3)**

A 3 a The following comments are reflective of the applicant's governance structure. The PR Early Childhood State Advisory Council (PR SAC), required for the purposes of providing oversight to the ELC and the ELD, provides the structure to promote and guarantee active participation and commitment from all government and non-government activities and components. The state is effective in bringing agencies to the table. MOUs (including the scope of work) with each state agency are included in the appendices. Monthly meetings and reporting is a provision under this section of the plan. The state has indicated that the signed MOU is the document that ensures the full participation, responsibility and continued commitment. There will be regular state cabinet meetings with PR SAC. ACUDEN and PR SAC will delineate strategies geared toward compliance and ongoing verification of all agreements. PR SAC includes representatives of family court, representatives of parent groups of children with disabilities, and special education ECE faculty members. Key stakeholders will be invited to participate. Intermediary agencies have provided letters of support. The state realizes that the success of the plan will depend on establishing and maintaining communication. Weaknesses of the governance structure include the lack of a definitive table of organization, nor does it define strategies for resolution of disputes. Sustainability is addressed, but all of the infrastructure developed is from one-time ARRA funding, and the continuance of the work will be from one time ELC funding. It is not clear how the project will be sustained. A 3 b The MOU's are included in the appendices. The documents are weak in that they are not explicit in terms of the Partnership responsibility in implementation. The appendices includes a table that more clearly defines the work of the partnership. Examples of specificity include: responsibility for the expansion and continuation of the scholarship fund, responsibility for the design and implementation of the early learning data system, and responsibility for the design and implementation of the data system. This chart aligns the responsibilities to the selection criteria and provides critical information to determine that PR has a plan for effective implementation not found in the narrative. A 3 c PR has included letters from stakeholders and intermediary organizations are included. The letters represent a broad base of support. There is a strong intent to support from the faith based organizations, which represent a strength in this reform effort. This section is awarded five points for Puerto Rico's efforts to include a broad base of stakeholders in the implementation of this grant and for the commitment to share responsibility in the implementation of the grant funds.

	Available	Score
(A)(4) Developing a budget to implement and sustain the work of this grant.	15	5

The extent to which the State Plan--

(a) Demonstrates how the State will use existing funds that support early learning and development from Federal, State, private, and local sources (e.g., CCDF; Title I and II of ESEA; IDEA; Striving Readers Comprehensive Literacy Program; State preschool; Head Start Collaboration and State Advisory Council funding; Maternal, Infant, and Early Childhood Home Visiting Program; Title V MCH Block Grant; TANF; Medicaid; child welfare services under Title IV (B) and (E) of the Social Security Act; Statewide Longitudinal Data System; foundation; other private funding sources) for activities and services that help achieve the outcomes in the State Plan, including how the quality set-asides in CCDF will be used;

(b) Describes, in both the budget tables and budget narratives, how the State will effectively and efficiently use funding from this grant to achieve the outcomes in the State Plan, in a manner that--

- (1) Is adequate to support the activities described in the State Plan;
- (2) Includes costs that are reasonable and necessary in relation to the objectives, design, and significance of the activities described in the State Plan and the number of children to be served; and
- (3) Details the amount of funds budgeted for Participating State Agencies, localities, Early Learning Intermediary Organizations, Participating Programs, or other partners, and the specific activities to be implemented with these funds consistent with the State Plan, and demonstrates that a significant amount of funding will be devoted to the local implementation of the State Plan; and

(c) Demonstrates that it can be sustained after the grant period ends to ensure that the number and percentage of Children with High Needs served by Early Learning and Development Programs in the State will be maintained or expanded.

Scoring Rubric Used. **Quality**

**Comments on (A)(4)**

A 4 a The only existing funds PR discusses are the ARRA funds. The lead agency ACUDEN is responsible for the budget and identifying the areas of the plan to be supported by the ELC funds. The budget supports six participating agencies projects in the grant for meeting established goals. A 4 b The funds requested support; 1 Project manager, 5 project coordinators, 3 administrative assistants, 1 information systems tech, and one driver. The budget includes money in year one to provide internet support, computers, office furniture, printers, and office supplies. Contractual services inclusive legal services, outreach audit, an Early Childhood consultant, and funds for project outreach. Monitoring early learning data system and automation for licensing and travel. Participating agencies are receiving funds to support the completion of responsibilities in the MOU's. Funds for preventive health care provided by the Department of Health These costs seem to be out of line with the low targets for follow up care described in the narrative. Professional Development requests include budgets for training staff and equipment. The Department of Family which is responsible for Family Engagement Standards request a program manager and 50 licensing officials. The Office of Sports and Recreation responsible for promoting health and physical well-being, (movement), supporting grant goals will receive funding. Personnel for ACUDEN is also included in the budget. Some of the budget requests are not related to the intended recipients of the grant. Some funding requests seem to target older children (as in recreation programs described in the project). There is not a clear connection about the use of funds for the technology and office furniture for general use. A 4 c PR has not demonstrated the sustainability of the project due to the investments of one time ARRA funds in developing the infrastructure, and the ELC funds to implement the work. Puerto Rico did not submit a budget narrative that clearly addresses sustainability after the grant period ends. Due to the lack of specificity in this section, and the grant funds dispersed to programs not targeting preschool children, this section is awarded five points.

**B. High-Quality, Accountable Programs**

	Available	Score
<b>(B)(1) Developing and adopting a common, statewide Tiered Quality Rating and Improvement System</b>	10	5

The extent to which the State and its Participating State Agencies have developed and adopted, or have a High-Quality Plan to develop and adopt, a Tiered Quality Rating and Improvement System that--

(a) Is based on a statewide set of tiered Program Standards that include--

- (1) Early Learning and Development Standards;
- (2) A Comprehensive Assessment System;
- (3) Early Childhood Educator qualifications;
- (4) Family engagement strategies;
- (5) Health promotion practices; and
- (6) Effective data practices;

(b) Is clear and has standards that are measurable, meaningfully differentiate program quality levels, and reflect high expectations of program excellence commensurate with nationally recognized standards that lead to improved learning outcomes for children; and

(c) Is linked to the State licensing system for Early Learning and Development Programs.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (B)(1)**

Puerto Rico has submitted evidence of TQRIS standards that include: B -1 a The content standards developed are considered to be a strength in the TQRIS proposed. The content standards for early learning programs are provided across the required domains. While Approaches to Learning is not addressed, the standards based instruction will take place in holistic environments indicating that the children have the opportunities to develop approaches to learning. These standards are based on the National Association for the Education of Young Children. These standards cover infant and toddlers, and preschool learning domains. The standards are provided in the appendices and are disseminated to all Early Head Start, Head Start, IDEA and Title 1 teachers in the ELD programs. Puerto Rico has not submitted evidence of a comprehensive assessment system for the TQRIS, inclusive of appropriate screening, formative, and readiness for the K level. Assessments are provided in the appendices, but the assessments do not generally provide for planning appropriate activities to meet individual needs within the classroom. The Ages and Stages Questionnaire is referenced, but this is a screening tool. The state has not addressed the formative assessments need to plan for individual needs, the environmental ratings of classrooms, and the adult/child interactions required for meeting this criteria. This section of the TQRIS is not complete. The state is proposing that the Qualified Workforce standards (which are incomplete) meet the CDA requirements. The state is working with the university on improving the standards. The Qualifications begin at the CDA level for licensing. The pilot programs describe three levels of staff qualifications. The description of the Family engagement is the strongest element in the TQRIS at present. A wide array of services is described, and are based on family strengths and goal setting. The health promotion practices include screening and evaluations to be provided by public service health agencies with a role for the Department of Recreation and Sports in preventive care. It is not clear how health promotion standards will be addressed at the classroom level. The data collection practices are weak to non-existent in this plan. The infrastructure does not support data collection at the level required by the TQRIS at this present time. B 1 b The TQRIS describes five levels of quality which appear to be measurable. The state has not provided evidence that the TQRIS has been or will be linked to the outcomes for children. B 1 c Licensing is addressed in this section and will be linked to the TQRIS. The licensing agents will be trained in the licensing standards under the new TQRIS. The state has planned for the improvement of the TQRIS. The plan is partially implemented in the TQRIS. The strongest elements include the early learning standards and the family engagement strategies. The weakest element is the Comprehensive Assessment system and the workforce development plan.

	Available	Score
<b>(B)(2) Promoting participation in the State's Tiered Quality Rating and Improvement System</b>	<b>15</b>	<b>5</b>

The extent to which the State has maximized, or has a High-Quality Plan to maximize, program participation in the State's Tiered Quality Rating and Improvement System by--

(a) Implementing effective policies and practices to reach the goal of having all publicly funded Early Learning and Development Programs participate in such a system, including programs in each of the following categories--

- (1) State-funded preschool programs;
- (2) Early Head Start and Head Start programs;
- (3) Early Learning and Development Programs funded under section 619 of part B of IDEA and part C of IDEA;
- (4) Early Learning and Development Programs funded under Title I of the ESEA; and
- (5) Early Learning and Development Programs receiving funds from the State's CCDF program;

(b) Implementing effective policies and practices designed to help more families afford high-quality child care and maintain the supply of high-quality child care in areas with high concentrations of Children with High Needs (e.g., maintaining or increasing subsidy reimbursement rates, taking actions to ensure affordable co-payments, providing incentives to high-quality providers to participate in the subsidy program); and

(c) Setting ambitious yet achievable targets for the numbers and percentages of Early Learning and Development Programs that will participate in the Tiered Quality Rating and Improvement System by type of Early Learning and Development Program (as listed in (B)(2)(a)(1) through (5) above).

Scoring Rubric Used: **Quality and Implementation**

**Comments on (B)(2)**

B2 a Puerto Rico has established a pilot study for the TQRIS currently in use. One hundred centers inclusive of Early Head Start, Head Start, centers receiving Child Care Development Funds (CCDF) funds, and licensed private centers. This represents a strength in the plan. PR will have centers that have some understanding of what participation means to assist in the recruitment of other participants. An increase in the number of scholarships for teachers to complete a CDA or BA degree (or related personnel) is expected to promote participation. The plan for expansion is sufficient. The first expansion of the TQRIS is planned for the 25 towns that serve children with high needs. This will support the intent of providing high quality program access to children with high needs. The state advisory council will take the lead in the promotion of participation in the State's TQRIS with support from ACUDEN, the Head Start Collaboration Office and the Head Start Directors. Additionally, the state will restructure the licensing system and aligned the restructuring system to the proposed TQRIS. The plan for restructuring will require the legislative body and the partnering agencies to revise existing laws, protocols, regulations, and the organizational structure. The Licensing qualifications for licensing agents will change. Head Start and Early Head Start, (currently exempted from licensing) will be required to meet the licensing standard by 2014-2015. Family care centers will be encouraged to participate through licensing programs. The Licensing Department will be further improved with the addition of 50 new licensing agents trained to support home care and centers through the process of licensing and TQRIS. The state proposes to increase the participation by 50% each year of the grant. B2 b Puerto Rico has minimally addressed this portion of the selection criterion in relation to the family access to high quality care. There will be a change in the CCDF subsidies, which will impact the families that are eligible. It appears that providing and maintaining high quality care for children with high needs is addressed by targeting the high needs communities. The lack of specific strategies weakens this section of the plan. B2 b a The state recognizes that the exemption of Early Head Start and Head Start will be a challenge in promoting participation in the TQRIS, but is implementing policies and incentives to ensure that private centers participate. The incentives will be centered around awards to personnel to assist with the completion of the CDA or the BA degree. Since the state pre-school is not listed in the completed table, it is not clear how the state pre-school will be included. Family care centers will be encouraged to participate through licensing programs. The Licensing Department will be further improved with the addition of 50 new licensing agents trained to support home care and centers through the process of licensing and TQRIS. The state proposes to increase the participation by 50% each year of the grant. The targeted regions are 25 towns considered with the highest population of children with high needs. B 2 c. The goals and targets set are achievable, but are not ambitious since only 300 programs participating represent 6% of the programs in the state will be participating by 2014-2015. The goal was based on the 100 centers in the pilot study. This section has been awarded five points. The weakness specifically noted are the lack of support for families to of children with high needs to access high quality care, and the low number of programs expected to be participating in the TQRIS by 2015.

	Available	Score
<b>(B)(3) Rating and monitoring Early Learning and Development Programs</b>	15	2

The extent to which the State and its Participating State Agencies have developed and implemented, or have a High-Quality Plan to develop and implement, a system for rating and monitoring the quality of Early Learning and Development Programs participating in the Tiered Quality Rating and Improvement System by--

(a) Using a valid and reliable tool for monitoring such programs, having trained monitors whose ratings have an acceptable level of inter-rater reliability, and monitoring and rating the Early Learning and Development Programs with appropriate frequency; and

(b) Providing quality rating and licensing information to parents with children enrolled in Early Learning and Development Programs (e.g., displaying quality rating information at the program site) and making program quality rating data, information, and licensing history (including any health and safety violations) publicly available in formats that are easy to understand and use for decision making by families selecting Early Learning and Development Programs and families whose children are enrolled in such programs.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (B)(3)**

B 3 a Puerto Rico proposes a monitoring of programs 3 times each year. These three visits include facilitation and support for programs to meet the TQRIS standards. This creates a potential conflict of interest between the rating and the support provided a center. Monitors assigned the responsibility of rating a center should not have a mentoring relationship with the staff. A TQRIS unit will be developed to provide orientation, dissemination of information, and technical assistance. Licensing will take place at the first levels. The TQRIS is the instrument selected. There is no reliability and validity on the instruments selected. The strength of this section is in the pilot of the TQRIS, but the success of the revised TQRIS will depend on the use of the information collected through the pilot. The state addresses and posting the licenses in the centers and developing a website for use in dissemination of this information. The website will not provide access for high poverty families without computers or internet access. There are activities on many levels to educate parents on the TQIRS to assist parents in selecting a child care program. Examples of the activities include group orientations, brochures, a media campaign and a consumer education process. The State Advisory Board newsletter will provide information to parents and early childhood programs among others. Puerto Rico is awarded two points for a partially implemented plan. Without the establishment of the reliability and the validity of the TQRIS and other concerns outlined above, PR has submitted a low quality response. PR is awarded 2 points.

	Available	Score
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**(B)(4) Promoting access to high-quality Early Learning and Development Programs for Children with High Needs**

20

6

The extent to which the State and its Participating State Agencies have developed and implemented, or have a High-Quality Plan to develop and implement, a system for improving the quality of the Early Learning and Development Programs participating in the Tiered Quality Rating and Improvement System by--

(a) Developing and implementing policies and practices that provide support and incentives for Early Learning and Development Programs to continuously improve (e.g., through training, technical assistance, financial rewards or incentives, higher subsidy reimbursement rates, compensation);

(b) Providing supports to help working families who have Children with High Needs access high-quality Early Learning and Development Programs that meet those needs (e.g., providing full-day, full-year programs; transportation; meals; family support services); and

(c) Setting ambitious yet achievable targets for increasing--

(1) The number of Early Learning and Development Programs in the top tiers of the Tiered Quality Rating and Improvement System; and

(2) The number and percentage of Children with High Needs who are enrolled in Early Learning and Development Programs that are in the top tiers of the Tiered Quality Rating and Improvement System.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (B)(4)**

B 4 a The state has indicated the intent to implement policies and establish practices to provide for continuous improvement of ELD programs, by providing scholarships to address the educational levels of ECE staff. These incentives include scholarships for continuing education (to achieve a CDA credential or a BA in Early Childhood) and technical assistance to centers to assist in licensing and the requirements of licensing being addressed at the policy level. The provision of monitors for three visits each year and provide facilitation to achieve high levels at the TQRIS will substantially increase the probability of continued progress. Scholarships are provided to staff and will provide incentives for teachers to continue education at high levels achieving a CDA or a BA. State funded preschools are not included in the goals and targets provided in this chapter. Goals and targets are not provided for years 1 and two. Support for families to increase access to programs in the top tiers are not addressed. The state is depending on the targeting of communities with high needs children to increase the access of families. Providing a change in the subsidy is being considered. The absence of support to individual families needing transportation or special support services, wrap around support or extended day services are not addressed. PR is awarded six points.

	Available	Score
<b>(B)(5) Validating the effectiveness of the State Tiered Quality Rating and Improvement System.</b>	15	3

The extent to which the State has a High-Quality Plan to design and implement evaluations--working with an independent evaluator and, when warranted, as part of a cross-State evaluation consortium--of the relationship between the ratings generated by the State's Tiered Quality Rating and Improvement System and the learning outcomes of children served by the State's Early Learning and Development Programs by--

(a) Validating, using research-based measures, as described in the State Plan (which also describes the criteria that the State used or will use to determine those measures), whether the tiers in the State's Tiered Quality Rating and Improvement System accurately reflect differential levels of program quality; and

(b) Assessing, using appropriate research designs and measures of progress (as identified in the State Plan), the extent to which changes in quality ratings are related to progress in children's learning, development, and school readiness.

Scoring Rubric Used: **Quality**

**Comments on (B)(5)**

B 5-a The content validity of the TQRIS, as described in the narrative, has been aligned to NAEYC standards. The validity, using research based measures has not been described in this plan. There is no way to evaluate this criteria. B 5-b The methods and design for establishing the reliability have not been described. Peer Review and having experts look at outcome data in relation to the TQRIS levels is not a rigorous and valid method of establishing reliability. There is no way to evaluate this criteria. Puerto Rico is awarded three points for the response in this section.

**Focused Investment Areas (C), (D), and (E)**

Each State must address in its application--

- (1) Two or more of the selection criteria in Focused Investment Area (C);
- (2) One or more of the selection criteria in Focused Investment Area (D); and
- (3) One or more of the selection criteria in Focused Investment Area (E).

The total available points for each Focused Investment Area will be divided by the number of selection criteria that the applicant chooses to address in that area, so that each selection criterion is worth the same number of points.

**C. Promoting Early Learning and Development Outcomes for Children**

The total available points that an applicant may receive for selection criteria (C)(1) through (C)(4) is 60. The 60 points will be divided by the number of selection criteria that the applicant chooses to address so that each selection criterion is worth the same number of points. For example, if the applicant chooses to address all four selection criteria under this Focused Investment Area, each criterion will be worth up to 15 points. If the applicant chooses to address two selection criteria, each criterion will be worth up to 30 points.

The applicant must address at least two of the selection criteria within Focused Investment Area (C), which are as follows:

	Available	Score
<b>(C)(1) Developing and using statewide, high-quality Early Learning and Development Standards.</b>	<b>15</b>	<b>6</b>
<p>The extent to which the State has a High-Quality Plan to put in place high-quality Early Learning and Development Standards that are used statewide by Early Learning and Development Programs and that--</p> <p>(a) Includes evidence that the Early Learning and Development Standards are developmentally, culturally, and linguistically appropriate across each age group of infants, toddlers, and preschoolers, and that they cover all Essential Domains of School Readiness;</p> <p>(b) Includes evidence that the Early Learning and Development Standards are aligned with the State's K-3 academic standards in, at a minimum, early literacy and mathematics;</p> <p>(c) Includes evidence that the Early Learning and Development Standards are incorporated in Program Standards, curricula and activities, Comprehensive Assessment Systems, the State's Workforce Knowledge and Competency Framework, and professional development activities; and</p> <p>(d) The State has supports in place to promote understanding of and commitment to the Early Learning and Development Standards across Early Learning and Development Programs.</p>		
Scoring Rubric Used: <b>Quality and Implementation</b>		
<b>Comments on (C)(1)</b>		
<p>C 1 a Puerto Rico has submitted learning standards that are comprehensive in the coverage of the essential domains of school readiness. The standards are to be covered in classrooms in a holistic learning environments and provide for optimal development. These standards are aligned with the states standards through primary school by subject, and include early literacy and mathematics. These standards are applied in the TQRIS and are culturally and linguistically relevant to the populations to be served. C 1 b These standards are aligned with the states standards through primary school by subject, and include early literacy and mathematics. The documents in the appendices support the alignment. C 1 c The standards are addressed in the TQRIS. There is a plan in place to provide Family Day Care training through the licensing in collaboration with the Department of Health and ACUDEN. Family Day Care manuals of daily activities and the tolls necessary to implement these activities are a part of this plan. This will increase the use of standards outside of the public preschool programs. The standards are not addressed through a comprehensive assessment system. There is a reporting system for parents' use in the appendices. Assessment (screenings and formative assessment for classroom use) to determine the child's development and achievement socially, emotionally, cognitively, and physically are not addressed. There is no plan for how these assessments would be used for developing classroom instruction. There is a plan to incorporate the standards into the Core Knowledge for early childhood educators. The goal of this activity is to provide the integration of standards based instruction in all early childhood education providers in Puerto Rico. The only assessment instrument referenced in this section is the Ages and Stages Questionnaire (ASQ), a valid, reliable, and developmentally appropriate screening instrument which does not meet the definition of a comprehensive assessment system. The plan for professional development provides for the contracting of trainers to facilitate the training coordination among agencies currently providing professional development. Workshops and professional development activities are planned to facilitate interpretation of the standards and alignment of activities in the curricula to the learning expectations. All participants will receive a manual to facilitate PR's standards based instruction, Puerto Rico has established incentives for early childhood workers to achieve high degrees, but it has not included how Universities will incorporate the standards in the coursework offered in the degree programs. C 1 d The state has demonstrated the intent for all Early Childhood providers in the development of the train the trainer model and the coordination of the professional development activities of participating agencies on standards based instruction. The plans in this section have not been implemented. Puerto has demonstrated the intent and provided evidence of activities in all areas except the Comprehensive Assessment System development.</p>		

	Available	Score
<b>(C)(2) Supporting effective uses of Comprehensive Assessment Systems.</b>	15	5

The extent to which the State has a High-Quality Plan to support the effective implementation of developmentally appropriate Comprehensive Assessment Systems by--

- (a) Working with Early Learning and Development Programs to select assessment instruments and approaches that are appropriate for the target populations and purposes;
- (b) Working with Early Learning and Development Programs to strengthen Early Childhood Educators' understanding of the purposes and uses of each type of assessment included in the Comprehensive Assessment Systems;
- (c) Articulating an approach for aligning and integrating assessments and sharing assessment results, as appropriate, in order to avoid duplication of assessments and to coordinate services for Children with High Needs who are served by multiple Early Learning and Development Programs; and
- (d) Training Early Childhood Educators to appropriately administer assessments and interpret and use assessment data in order to inform and improve instruction, programs, and services.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (C)(2)**

C-2 a Puerto Rico has acknowledge the weaknesses of the ELD assessment system in the narrative by indicating that the need to improve will begin with the universal use of the ASQ as the assessment tool by early childhood programs. This does not meet the criteria for working with early childhood programs in selecting developmentally appropriate assessments for use with the children. C-2 b This criterion of training early childhood instructors in the understanding of and the purposes of each type of assessment in the Comprehensive Assessment system has not been addressed. PR's proposal addresses the use of the screening tool to inform instruction across the standards. The ASQ, as a screening tool will not align with the standards or provide for the formative assessments need in standards based instruction. The state has not addressed the formative assessments need to plan for individual needs, the environmental ratings of classrooms, and the adult/child interactions required for meeting this criteria. In the absence of references to other types of assessments, PR has not met the criteria of training early childhood instructors on the comprehensive assessment system. C -2 c PR has not proposed a plan for this indicator. The plan describes the dissemination of the ASQ and entering the data into the proposed web based data system. C- 2 d The provisions for training of Early Childhood educators on the administration and use of the assessments is covered for the screening tool – ASQ. There is a plan for training staff on the TQRIS by providing on site support to improve TQRIS. Puerto Rico's plans have not been implemented for this section. The use of the ASQ limits the responses for the indicators in this section.

	Available	Score
<b>(C)(3) Identifying and addressing the health, behavioral, and developmental needs of Children with High Needs to improve school readiness.</b>	15	2

The extent to which the State has a High-Quality Plan to identify and address the health, behavioral, and developmental needs of Children with High Needs by--

- (a) Establishing a progression of standards for ensuring children's health and safety; ensuring that health and behavioral screening and follow-up occur; and promoting children's physical, social, and emotional development across the levels of its Program Standards;
- (b) Increasing the number of Early Childhood Educators who are trained and supported on an on-going basis in meeting the health standards;
- (c) Promoting healthy eating habits, improving nutrition, expanding physical activity, and
- (d) Leveraging existing resources to meet ambitious yet achievable annual targets to increase the number of Children with High Needs who--
  - (1) Are screened using Screening Measures that align with the Medicaid Early Periodic Screening, Diagnostic and Treatment benefit (see section 1905(r)(5) of the Social Security Act) or the well-baby and well-child services available through the Children's Health Insurance Program (42 CFR 457.520), and that, as appropriate, are consistent with the Child Find provisions in IDEA (see sections 612(a)(3) and 635(a)(5) of IDEA);
  - (2) Are referred for services based on the results of those screenings, and where appropriate, received follow-up; and
  - (3) Participate in ongoing health care as part of a schedule of well-child care, including the number of children who are up to date in a schedule of well-child care.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (C)(3)**

C-3 a Puerto Rico's plan for identifying the and addressing the health and safety needs is a weakness. The progression of standards referenced in Table A-1 8 indicates that all of the programs receiving the state and federal funding are using health and safety standards in their programs that assure children are receiving services in a safe and healthy environment. The weakness is indicated in the use of the standards across the TQRIS. The provision of health and behavioral screening only occurs with children that have been identified as children with disabilities, in Head Start and Early Head Start programs, and programs receiving CCDF funds. Screening for behavioral , health, and sensory needs is not consistent across the TQRIS standards (appearing at level 4 and different at different levels of complexity across levels 1-5). The physical development, social, and emotional development is addressed in the Early Learning Standards. C-3 b Puerto Rico has not addressed the training of teachers who are trained and supported on an ongoing basis for meeting health standards. This indicators cannot be evaluated. C-3 c PR's plan for promoting healthy eating habits, improving nutrition, and expanding physical activity is minimally addressed by the Department of Sports and Recreation. The institute will replicate current activities provided for children ages 7 -13 years of age for the Birth through five population. The plan does not indicate how participants will be recruited and how it will impact preschool programming. The plan for Health Literacy is included in the Family Engagement Strategies through the Department of Health and the Healthy Start Program provided in the home visiting programs for children ages birth through five. Healthy and drug free life styles are provided through the Positive Parenting skills workshops. C-3 d Puerto Rico is relying heavily on the medical community to provide the support for the health screenings required to meet the requirement this section. The evidence in Table C 3 d indicates that there are over 33,000 children with high needs screened. Of the 33,000 screened less than 10,000 are receiving follow up treatment. It is not clear in this section how Puerto Rico is funding these screenings. Children with special needs are also receiving these services. The target for 2015 is 28%. The baseline data and the targets for children with high needs receiving follow-up is extremely low. The goal for 2015 is 3.5%. The target for children with high needs receiving ongoing health care is 27% for 2015, with only 28% of children who are up to date on a schedule of well child care for the end of the grant period. These targets are achievable, but are not ambitious. Puerto Rico has not demonstrated a commitment to identifying and addressing the health, behavioral, and developmental needs of children with high needs to improve school readiness. The lack of a specific plan to support the needs of the children, the needs of the staff to identify and address needs within the center, and disconnect between the activities and the criteria earns Puerto Rico 2 points on this section.

	Available	Score
<b>(C)(4) Engaging and supporting families.</b>	15	7
<p>The extent to which the State has a High-Quality Plan to provide culturally and linguistically appropriate information and support to families of Children with High Needs in order to promote school readiness for their children by--</p> <p>(a) Establishing a progression of culturally and linguistically appropriate standards for family engagement across the levels of its Program Standards, including activities that enhance the capacity of families to support their children's education and development;</p> <p>(b) Increasing the number and percentage of Early Childhood Educators trained and supported on an on-going basis to implement the family engagement strategies included in the Program Standards; and</p> <p>(c) Promoting family support and engagement statewide, including by leveraging other existing resources such as through home visiting programs, other family-serving agencies, and through outreach to family, friend, and neighbor caregivers.</p>		

Scoring Rubric Used: **Quality and Implementation**

**Comments on (C)(4)**

C-4 a Puerto Rico has a wide array of family engagement practices that the state has determined are not culturally and linguistically appropriate. The activities are driven by program requirements and do not reflect the progression of standards across a continuum. The strength is that all activities are provided and developed through assessing the family's strengths. C-4-b The state has not set targets for increasing the number of families to be provided family engagement across the continuum. It is not possible to evaluate this criteria. C-4 c The sustainability of this program is in the family engagement specialist personnel exist across the agencies through the Born Learning Program. Other programs, such as the Mental Health and Anti-Addiction Services Administration (ASSMCA), the Department of Parks and Recreation, CENTRANA, and the Office of Socioeconomic Finance and Empowerment (OSFA) will continue family engagement through the programmatic requirements and focus of the agency. Puerto Rico has not addressed significant changes or reform efforts through the training of Early Childhood educators to provide center based family engagement. Support for this evaluation of C-4 is supported by the Budget Requests from the ELC challenge fund for programs such as the Department of Parks and Recreation.

**D. A Great Early Childhood Education Workforce**

The total points that a State may earn for selection criteria (D)(1) and (D)(2) is 40. The 40 points will be divided by the number of selection criteria that the applicant chooses to address so that each selection criterion is worth the same number of points. For example, if the applicant chooses to address both selection criteria under this Focused Investment Area, each criterion will be worth up to 20 points. If the applicant chooses to address one selection criterion, the criterion will be worth up to 40 points.

The applicant must address at least one of the selection criteria within Focused Investment Area (D), which are as follows:

	Available	Score
<b>(D)(1) Developing a Workforce Knowledge and Competency Framework and a progression of credentials.</b>	20	8

The extent to which the State has a High-Quality Plan to--

- (a) Develop a common, statewide Workforce Knowledge and Competency Framework designed to promote children's learning and development and improve child outcomes;
- (b) Develop a common, statewide progression of credentials and degrees aligned with the Workforce Knowledge and Competency Framework; and
- (c) Engage postsecondary institutions and other professional development providers in aligning professional development opportunities with the State's Workforce Knowledge and Competency Framework.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (D)(1)**

D-1 a The state has developed early childhood continuing education courses to improve educator competencies. These courses are not related to the Workforce Knowledge and Competency Framework or a progression of credentialing. Three of Puerto Rico's 11 campuses at the university offer early childhood and pre-school training. The Graduate School of public Health offers graduate certification in development disabilities. To provide workforce for early intervention. The state's intention is to align the training with the TQRIS. The competencies will be framed in the following areas: child development, positive relations and socio emotional development and wellness, health promotion and safety environment, curriculum development, implementation and evaluation, family engagement, community relations, observation and assessment, ethics. The professional development addresses families and support personnel (speech therapist, psychologists). This can be considered a strength for this section. There are no goals and benchmarks to support the work of this criteria throughout the grant period with the exception of the CDA. The state proposes significant reform in the professional development of ECE professionals and this section, but does not provide the goals and benchmarks needed to support the work. D-1 b Puerto Rico has defined three tiers of educator progression. These tiers are described as Beginning, Intermediate, and Advanced. It is not clearly indicated how the educators will advance in the tiers described. The Beginning level will include the attainment of a CDA. D-1 c PR has established the intent to engage the Universities in this work, but the role is not clearly defined. The data in section A indicates that there are not many degree programs aligned with the Workforce Standards. In the absence of strong commitment in the scope of work, it is not clear how PR will engage the staff of the Universities in the work. ACUDEN and other partners have more clearly defined roles.

	Available	Score
<b>(D)(2) Supporting Early Childhood Educators in improving their knowledge, skills, and abilities.</b>	20	8

The extent to which the State has a High-Quality Plan to improve the effectiveness and retention of Early Childhood Educators who work with Children with High Needs, with the goal of improving child outcomes by--

- (a) Providing and expanding access to effective professional development opportunities that are aligned with the State's Workforce Knowledge and Competency Framework;
- (b) Implementing policies and incentives (e.g., scholarships, compensation and wage supplements, tiered reimbursement rates, other financial incentives, management opportunities) that promote professional improvement and career advancement along an articulated career pathway that is aligned with the Workforce Knowledge and Competency Framework, and that are designed to increase retention;
- (c) Publicly reporting aggregated data on Early Childhood Educator development, advancement, and retention; and
- (d) Setting ambitious yet achievable targets for--
  - (1) Increasing the number of postsecondary institutions and professional development providers with programs that are aligned to the Workforce Knowledge and Competency Framework and the number of Early Childhood Educators who receive credentials from postsecondary institutions and professional development providers

that are aligned to the Workforce Knowledge and Competency Framework; and

(2) Increasing the number and percentage of Early Childhood Educators who are progressing to higher levels of credentials that align with the Workforce Knowledge and Competency Framework.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (D)(2)**

D-2a ACUDEN is leading the effort in developing new opportunities of professional development. New coursework is being designed. Efforts in personnel development will be led by the Puerto Rico Early Childhood Workforce Institute (ECWI), which will be established by ACUDEN. This Institute will work in coordination with the Council in the design, development and evaluation of the system. The ECWI also will create a definition of early childhood educator for Puerto Rico and a reference document. The state will collaborate with participating agencies, and with the universities, all of which are not currently aligned to the Workforce Credentials, to expand professional development options and courses for educators. D2 b The state has clearly defined the intention of providing scholarships and stipends for improved credentialing. Child care workers, teachers, and administrators of the partnering agencies were included in the award of scholarships and stipends. There was no evidence of improved wages provided in this plan. These stipends and scholarships are not linked to the workforce development credentials except at the beginning level. The incentive of a scholarship for the CDA will place a teacher at the beginning level. D-2 c The state has not provided evidence of how the credentialing will be reported to the public. The intent is to track educators at the beginning, intermediate, and advanced levels. The state has begun to define the levels, but there is not enough information to determine if the levels could be applied across the system. In the absence of a data collection system, it does not appear that this information can be tracked. PR has not developed the data system, and has not determined how and when the data can be collected. The only tracking evidence with supporting goals and targets is the CDA credential. . With ELC funds devoted to the attainment of a BA and Master's level, it would seem appropriate to provide targets for these degrees. D 2d The goals sets for the number of aligned professional development and credential providers are overly ambitious. There is no baseline and the goal of 100% of the schools providing a credential is not achievable without baseline data and targets to guide the work. The plan for increasing the percentage of the work force moving up in credentialing is not complete. The plan targets individuals achieving a CDA. Goals and benchmarks have been set for this, and are achievable, but not ambitious due to the baseline figures. Two hundred CDA's awarded over a period of four years does not seem to be adequate for the support provided to educators in the application.

**E. Measuring Outcomes and Progress**

*The total points an applicant may earn for selection criteria (E)(1) and (E)(2) is 40. The 40 points will be divided by the number of selection criteria that the applicant chooses to address so that each selection criterion is worth the same number of points. For example, if the applicant chooses to address both selection criteria under this Focused Investment Area, each criterion will be worth up to 20 points. If the applicant chooses to address one selection criterion, the criterion will be worth up to 40 points.*

*The applicant must address at least one of the selection criteria within Focused Investment Area (E), which are as follows:*

	Available	Score
<b>(E)(1) Understanding the status of children's learning and development at kindergarten entry.</b>	20	10
<p>The extent to which the State has a High-Quality Plan to implement, independently or as part of a cross-State consortium, a common, statewide Kindergarten Entry Assessment that informs instruction and services in the early elementary grades and that--</p> <p>(a) Is aligned with the State's Early Learning and Development Standards and covers all Essential Domains of School Readiness;</p> <p>(b) Is valid, reliable, and appropriate for the target population and for the purpose for which it will be used, including for English learners and children with disabilities;</p> <p>(c) Is administered beginning no later than the start of school year 2014-2015 to children entering a public school kindergarten; States may propose a phased implementation plan that forms the basis for broader statewide implementation;</p> <p>(d) Is reported to the Statewide Longitudinal Data System, and to the early learning data system, if it is separate from the Statewide Longitudinal Data System, as permitted under and consistent with the requirements of Federal, State, and local privacy laws; and</p> <p>(e) Is funded, in significant part, with Federal or State resources other than those available under this grant. (e.g., with funds available under section 6111 or 6112 of the ESEA).</p>		

Scoring Rubric Used: **Quality and Implementation**

**Comments on (E)(1)**

E-1 a PR has developed a Kindergarten Readiness Assessment that appears to be aligned with all of the early learning domains. Alignment to the standards is questioned at this time. Puerto Rico has not provided evidence of this work in the narrative. PR is in the planning stages. E-1 b The Kindergarten Readiness Assessment has been validated by experts and teachers for content validity. Rigorous validation studies have not been conducted using this readiness instruments. The methods for establishing reliability and the reliability of the instrument have not been implemented. E-1 c The Kindergarten Readiness Assessment is administered within the first two weeks of Kindergarten. There appears to be a voluntary use of the instrument across the programs under the TQRIS. PR does not have a specific plan for requiring statewide use of the assessment. E-1 d The data is not submitted to the Statewide Longitudinal Data System. The system is in the planning stages, so this criteria will not be evaluated. E-1 e Puerto Rico will use ARRA and ELC funds to develop the database. Puerto Rico has partially implemented the Assessment system. The use of the Kindergarten Readiness instrument is not aligned with the purposes of the ELC at this time.

	Available	Score
<b>(E)(2) Building or enhancing an early learning data system to improve instruction, practices, services, and policies.</b>	20	6

The extent to which the State has a High-Quality Plan to enhance the State's existing Statewide Longitudinal Data System or to build or enhance a separate, coordinated, early learning data system that aligns and is interoperable with the Statewide Longitudinal Data System, and that either data system--

- (a) Has all of the Essential Data Elements;
- (b) Enables uniform data collection and easy entry of the Essential Data Elements by Participating State Agencies and Participating Programs;
- (c) Facilitates the exchange of data among Participating State Agencies by using standard data structures, data formats, and data definitions such as Common Education Data Standards to ensure interoperability among the various levels and types of data;
- (d) Generates information that is timely, relevant, accessible, and easy for Early Learning and Development Programs and Early Childhood Educators to use for continuous improvement and decision making; and
- (e) Meets the Data System Oversight Requirements and complies with the requirements of Federal, State, and local privacy laws.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (E)(2)**

E-2 a Puerto Rico's data system is in the developmental stages. It is not possible to determine if all of the Essential Data Elements are included. E-2 b In the absence of the data system it is not possible to evaluate this criteria. PR references some plans for collecting data. E-2 c Puerto Rico's partners are determining how they will collect and exchange data under the existing program regulations. This indicator cannot be evaluated due to lack of evidence. E-2 d The data system as planned, might generate data in a timely manner. It is unclear if this is a priority in the plan. E-2 e Puerto Rico's intent appears to be voluntary. Parents may not wish data to be collected, and may not be required to do so. Puerto Rico's implementation of this system has not begun. The plan submitted evidence that includes collaboration among the partners to ensure that privacy laws and sharing of data is appropriate.

	Available	Score
<b>Total Points Available for Selection Criteria</b>	280	108

**Priorities**

Competitive Preference Priorities

	Available	Score
<b>Competitive Preference Priority 2: Including all Early Learning and Development Programs in the Tiered Quality Rating and Improvement System</b>	10	5

Competitive Preference Priority 2 is designed to increase the number of children from birth to kindergarten entry who are participating in programs that are governed by the State's licensing system and quality standards, with the goal that all licensed or State-regulated programs will participate. The State will receive points for this priority based on the extent to which the State has in place, or has a High-Quality Plan to implement no later than June 30, 2015--

- (a) A licensing and inspection system that covers all programs that are not otherwise regulated by the State and that regularly care for two or more unrelated children for a fee in a provider setting; provided that if the State exempts programs for reasons other than the number of children cared for, the State may exclude those entities and reviewers will score this priority only on the basis of non-excluded entities; and

(b) A Tiered Quality Rating and Improvement System in which all licensed or State-regulated Early Learning and Development Programs participate.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (P)(2)**

Puerto Rico's plan for licensing does not provide for current programs exempted for licensing being required to participate. A tiered quality rating system is in place and is related to licensing. Family Friend and Neighbor care providers are exempt from licensing, and it is not clear if they will be included. PR partially met the requirement for P(2).

Priorities

	Available	Yes/No
<b>Competitive Preference Priority 3: Understanding the Status of Children's Learning and Development at Kindergarten Entry</b>	<b>0 or 10</b>	<b>No</b>
<p>To meet this priority, the State must, in its application--</p> <p>(a) Demonstrate that it has already implemented a Kindergarten Entry Assessment that meets selection criterion (E)(1) by indicating that all elements in Status Table (A)(1)-12 are met; or</p> <p>(b) Address selection criterion (E)(1) and earn a score of at least 70 percent of the maximum points available for that criterion.</p>		
<b>Comments on (P)(3)</b>		
E 1 earned 50% of the points available.		

Absolute Priority

	Met? Yes/No
<b>Absolute Priority - Promoting School Readiness for Children with High Needs.</b>	<b>No</b>
<p>To meet this priority, the State's application must comprehensively and coherently address how the State will build a system that increases the quality of Early Learning and Development Programs for Children with High Needs so that they enter kindergarten ready to succeed.</p> <p>The State's application must demonstrate how it will improve the quality of Early Learning and Development Programs by integrating and aligning resources and policies across Participating State Agencies and by designing and implementing a common, statewide Tiered Quality Rating and Improvement System. In addition, to achieve the necessary reforms, the State must make strategic improvements in those specific reform areas that will most significantly improve program quality and outcomes for Children with High Needs. Therefore, the State must address those criteria from within each of the Focused Investment Areas (sections (C) Promoting Early Learning and Development Outcomes for Children, (D) A Great Early Childhood Education Workforce, and (E) Measuring Outcomes and Progress) that it believes will best prepare its Children with High Needs for kindergarten success.</p>	
<b>Comments on Absolute Priority</b>	
<p>Puerto Rico has addressed the need for an overhaul of its ELD programs. The state has used ARRA funds to develop the infrastructure for improved early childhood programming in the state. Puerto Rico acknowledges the needs for continuing improvement, but has failed to provide the evidence that their reform effort will result in improved kindergarten readiness. The state addressed each area of the focused investment efforts, but not with the intensity and the quality needed to make the necessary reforms. The absence of clearly delineated targets and benchmarks within each area also indicate that the state needs more focus in developing the plan.</p>	





Race to the Top – Early Learning Challenge Review



Technical Review Form Page

Application # PR-5032

Peer Reviewer: [Redacted]
Lead Monitor: [Redacted]
Support Monitor: [Redacted]
Application Status: Reviewed
Date/Time: 11/17/2011 - 12:41 PM

CORE AREAS (A) and (B)

States must address in their application all of the selection criteria in the Core Areas.

A. Successful State Systems

Table with 3 columns: Core Area, Available, Score. Row 1: (A)(1) Demonstrating past commitment to early learning and development, 20, 14. Includes sub-points (a) through (d) regarding financial investment, participation numbers, legislation, and system building blocks.

Scoring Rubric Used: Quality

Comments on (A)(1)

Puerto Rico (PR) faces enormous challenges for ensuring that every child enters kindergarten ready. Eighty-two percent of young children under 5 are growing up in low income families. PR's application provides evidence of their significant commitment to early childhood programs and services and investment in Early Learning and Development Programs and services for Children with High Needs. In 2008, PR passed Public Law 93, unique legislation that guarantees the rights of children and establishes the country's investment in early childhood as an investment in the human capital of society. Despite the economic challenges of the past five years, PR has a consistent record of increasing investments in supplemental funding for Head Start (HS), Early Head Start (EHS), state preschool, and special education services, Child Care and Development Fund (CCDF) vouchers. PR provided an additional \$20 million in ARRA funding for CCDF vouchers in 2010 for 16,500 High Needs Children in licensed settings. They also expanded the CENTRANA family resource centers and piloted a QRIS with provider incentives and support to improve their quality, conducted training for 4,880 early childhood educators, provided mentoring for informal family child care providers, gave CDA scholarships to 100 providers and held a 3 day Director's Academy for 188 administrators. PR has some of the building blocks for a high quality early learning and development system in place, but many of the key areas have not been developed and critical building blocks are missing. Their narrative describes that their Early Learning and Development Standards, revised in 2010, are based on the National Association for the Education of Young Children's Developmentally Appropriate Practice guidelines, were vetted in focus groups and by a broad range of experts, and meet all of the Essential Domains of School Readiness for Infants, toddlers and preschoolers. PR lacks crucial elements of a Comprehensive Assessment System, including measures of environmental quality and the quality of teacher-child interactions. Screening measures and formative assessments are used at the program level but not systemically and the data are not collected in a coherent data system. Programs develop health policies based on the Guidelines for Preventive Care and PR's health promotion activities include good eating habits and nutrition. However, they do not have a separate set of Health Standards for programs. PR funds a plethora of family engagement strategies in various programs, they have not developed any evidence-based standards for family engagement. They also have no framework developed for the Core Knowledge needed by early educators and their post secondary

credentials and other training are not aligned to any common standards for children or expectations for early childhood educators. Their current data collection is incomplete and inconsistently collected. They developed a State Plan 3 years ago, followed by the Governor's establishment of the Early Childhood State Advisory Council (SAC). Before this, Puerto Rico lacked an organizational structure capable of focused on aligning all of the key state agencies and collaborating with community stakeholders to increase the accessibility of high quality Early Learning and development Programs and services for Children with High Needs accountable for preparing all children for success in kindergarten.

	Available	Score
<b>(A)(2) Articulating the State's rationale for its early learning and development reform agenda and goals.</b>	20	5

The extent to which the State clearly articulates a comprehensive early learning and development reform agenda that is ambitious yet achievable, builds on the State's progress to date (as demonstrated in selection criterion (A)(1)), is most likely to result in improved school readiness for Children with High Needs, and includes--

(a) Ambitious yet achievable goals for improving program quality, improving outcomes for Children with High Needs statewide, and closing the readiness gap between Children with High Needs and their peers;

(b) An overall summary of the State Plan that clearly articulates how the High-Quality Plans proposed under each selection criterion, when taken together, constitute an effective reform agenda that establishes a clear and credible path toward achieving these goals; and

(c) A specific rationale that justifies the State's choice to address the selected criteria in each Focused Investment Area (C), (D), and (E), including why these selected criteria will best achieve these goals.

Scoring Rubric Used: **Quality**

**Comments on (A)(2)**

Puerto Rico's reform agenda for their early learning system is guided by a comprehensive public policy for early childhood programs and services. The Law for the Implementation of Public Policies for Early Childhood passed by the PR Senate in 2008, addresses: Birth Assurance, Health, Arts and Culture, Education, Security and Protection, Family, and Sports and Recreation. Eighty-two percent of children under 5 in PR are growing up in low income families and 138,621 young children do not attend a formal Early Learning and Development Program. It is difficult to assess whether PR's goals are ambitious and achievable because their narrative for (A)(2) defines what is needed but is missing clearly stated key goals and detailed plans for achieving them. Also, some of the information and targets provided in the Performance Measures are unclear. Their application states: This State Plan addresses the following major areas: greater accessibility of services for high needs children, development of improved quality infrastructure, professional development, and family engagement. However, their response to articulating their rationale for their reform agenda does not provide goals and well thought out plans for how they will address these areas. In preparing their application, PR sought input from the Participating Agencies and key stakeholders who identified the following priorities for their early learning and development system: 1) Scaling up the pilot of the Tiered Quality Rating and Improvement System, 2) Curricula and the evaluation process that aligns with the Early Learning Standards, 3) A uniform approach for aligning and integrating assessment and sharing assessment results, 4) The administration, interpretation and use of assessment data to inform and improve instruction, programs and services, 5) A Core Knowledge Framework for the Workforce to guide professional development, 6) Standards for family engagement, 7) Outdoor play areas and staff training to promote physical activity and development, 8) An early childhood data system. These system priorities relate to the Race to the Top criteria. However, PR's response does not provide clear goals linked to key activities that, when considered together, provide a clear and credible path toward achieving the goals. They also did not provide implementation plans including realistic timelines and key milestones, the responsible parties for implementing the key activities, adequate and reasonable resources needed for successful implementation, and how implementing their goals will meet the needs of High Needs Children and special populations of Children with High Needs. PR chose to address all of the Focused Investment Areas but did not provide a rationale for their choices. This response is a low quality plan and scores a 5.

	Available	Score
<b>(A)(3) Aligning and coordinating early learning and development across the State</b>	10	6

The extent to which the State has established, or has a High-Quality Plan to establish, strong participation and commitment in the State Plan by Participating State Agencies and other early learning and development stakeholders by--

(a) Demonstrating how the Participating State Agencies and other partners, if any, will identify a governance structure for working together that will facilitate interagency coordination, streamline decision making, effectively allocate resources, and create long-term sustainability and describing--

(1) The organizational structure for managing the grant and how it builds upon existing interagency governance structures such as children's cabinets, councils, and commissions, if any already exist and are effective;

(2) The governance-related roles and responsibilities of the Lead Agency, the State Advisory Council, each Participating State Agency, the State's Interagency Coordinating Council for part C of IDEA, and other partners, if any;

(3) The method and process for making different types of decisions (e.g., policy, operational) and resolving disputes; and

(4) The plan for when and how the State will involve representatives from Participating Programs, Early Childhood Educators or their representatives, parents and families, including parents and families of Children with High Needs, and other key stakeholders in the planning and implementation of the activities carried out under the grant.

(b) Demonstrating that the Participating State Agencies are strongly committed to the State Plan, to the governance structure of the grant, and to effective implementation of the State Plan, by including in the MOU or other binding agreement between the State and each Participating State Agency--

(1) Terms and conditions that reflect a strong commitment to the State Plan by each Participating State Agency, including terms and conditions designed to align and leverage the Participating State Agencies' existing funding to support the State Plan;

(2) "Scope-of-work" descriptions that require each Participating State Agency to implement all applicable portions of the State Plan and a description of efforts to maximize the number of Early Learning and Development Programs that become Participating Programs; and

(3) A signature from an authorized representative of each Participating State Agency; and

(c) Demonstrating commitment to the State Plan from a broad group of stakeholders that will assist the State in reaching the ambitious yet achievable goals outlined in response to selection criterion (A)(2)(a), including by obtaining--

(1) Detailed and persuasive letters of intent or support from Early Learning Intermediary Organizations, and, if applicable, local early learning councils; and

(2) Letters of intent or support from such other stakeholders as Early Childhood Educators or their representatives; the State's legislators; local community leaders; State or local school boards; representatives of private and faith-based early learning programs; other State and local leaders (e.g., business, community, tribal, civil rights, education association leaders); adult education and family literacy State and local leaders; family and community organizations (e.g., parent councils, nonprofit organizations, local foundations, tribal organizations, and community-based organizations); libraries and children's museums; health providers; and postsecondary institutions.

**Scoring Rubric Used: Quality and Implementation**

**Comments on (A)(3)**

Puerto Rico's organizational structure for the RTTT grant builds on their Early Childhood State Advisory Council's (PRSAC) leadership for their early childhood system to be the lead agency for the grant. This appears to be a sound decision because their narrative states that PRSAC has a proven track record of bringing executive agencies to the table to coordinate programs and services. The Administration for the Integral Child Care and Development (ACUDEN), the agency that oversees Head Start and child care CCDF funding is the key agency for implementation of the grant. -- The PRSAC is charged with promoting and guaranteeing active participation and commitment from all government and non-governmental components of Puerto Rico's RTTT activities. As the lead for development of the state's RTTT application, PRSAC established collaboration with Participating State Agencies as well as the University of Puerto Rico, key legislators, business leaders, non-governmental agencies and early childhood stakeholder organizations. -- PRSAC has direct responsibility for ensuring active participation and collaboration for implementing their State Plan. The PRSAC's fulltime staff and support personnel will coordinate and monitor Participating State Agencies' and community partners' participation and commitments. However, there is no discussion of the process that will be used to resolve issues or disagreements. Evidence of the Participating State Agency's commitment to the State Plan, each Participating State Agency wrote a letter of intent and signed the MOU for Puerto Rico's RTTT grant outlining their responsibility and the expectations for collaboration. The Work Plan for Participating State Agencies provides the scope of work and the specific activities each agency is tasked with. The PRSAC will invite the broad group of stakeholders to monthly meetings and will seek regular input and recommendations periodically from committed stakeholders. PRSAC will also propose a process to promote effective communication, orderly participation and resolve issues that arise. Demonstrating commitment from a broad group of stakeholders, the state's RTTT application includes letters of support from Early Learning Intermediary Organizations and from PR's legislators; local community leaders; local school boards; their faith-based initiative; business leaders, family and community organizations, a children's museum; health care providers; and the University of Puerto Rico. Most of the letters follow the same format with little additional detail of their specific commitment. In particular, the letter from a key stakeholder, the director of the Head Start Association, was very brief and perfunctory. This was scored as a partially implemented medium quality response.

	Available	Score
(A)(4) Developing a budget to implement and sustain the work of this grant.	15	6

The extent to which the State Plan--

(a) Demonstrates how the State will use existing funds that support early learning and development from Federal, State, private, and local sources (e.g., CCDF; Title I and II of ESEA; IDEA; Striving Readers Comprehensive Literacy Program; State preschool; Head Start Collaboration and State Advisory Council funding; Maternal, Infant, and Early Childhood Home Visiting Program; Title V MCH Block Grant; TANF; Medicaid; child welfare services under Title IV (B) and (E) of the Social Security Act; Statewide Longitudinal Data System; foundation; other private funding sources) for activities and services that help achieve the outcomes in the State Plan, including how the quality set-asides in CCDF will be used;

(b) Describes, in both the budget tables and budget narratives, how the State will effectively and efficiently use funding from this grant to achieve the outcomes in the State Plan, in a manner that--

- (1) Is adequate to support the activities described in the State Plan;
- (2) Includes costs that are reasonable and necessary in relation to the objectives, design, and significance of the activities described in the State Plan and the number of children to be served; and
- (3) Details the amount of funds budgeted for Participating State Agencies, localities, Early Learning Intermediary Organizations, Participating Programs, or other partners, and the specific activities to be implemented with these funds consistent with the State Plan, and demonstrates that a significant amount of funding will be devoted to the local implementation of the State Plan; and

(c) Demonstrates that it can be sustained after the grant period ends to ensure that the number and percentage of Children with High Needs served by Early Learning and Development Programs in the State will be maintained or expanded.

Scoring Rubric Used: **Quality**

**Comments on (A)(4)**

Puerto Rico's budget tables and narratives clearly delineate how they will use RTTT grant funding for the activities of Participating State Agencies. Their budget also shows how they will use existing funds that support early learning and development from Federal, State, private, and local sources. In the Department of Sports and Recreation's budget for the grant, \$6 million is proposed for improving parks and \$7 million for additions to a park in San Juan to include a mini-golf course, water slides, etc. The plan for a recreational park in San Juan emphasizing preschool activities is an innovative idea; however, the State does not develop a strong case for the amount budgeted, for example, how many High Needs Children are projected to use the park and how specifically, building the park is aligned with the goal of improving High Needs Children's school readiness. Building a number of regional Born to Learn parks has the potential of reaching more High Needs Children but the State needs to include more detail about who will use them and how and link the project to the focus on achieving the outcome of ensuring that High Needs Children are prepared for success in school. Also, the amount of \$4,362.72 per child for the Play for Youth Health to train 3,000 people to work on sport activities with preschoolers seems out of proportion to other priorities, for instance, \$950,168 total for the professional development scholarship program. Also, the ACUMEN agency proposes \$280,000 for an agency reorganization process and \$48,000 for travel compared with the budgeted amount of \$145,264 total for training of program staff on all of the State Plan's areas. Also, the \$11,000 for furniture and equipment for every Department of Education pre-kindergarten classroom compared to \$100,000 total per year for grants to child care centers for facility and capital improvements seems out of balance. PR does not address the sustainability of their budget activities. Based on the deficiencies mentioned above, the budget section was a medium low quality response and scored 6.

**B. High-Quality, Accountable Programs**

	Available	Score
<b>(B)(1) Developing and adopting a common, statewide Tiered Quality Rating and Improvement System</b>	<b>10</b>	<b>6</b>
<p>The extent to which the State and its Participating State Agencies have developed and adopted, or have a High-Quality Plan to develop and adopt, a Tiered Quality Rating and Improvement System that--</p> <p>(a) Is based on a statewide set of tiered Program Standards that include--</p> <ol style="list-style-type: none"> <li>(1) Early Learning and Development Standards;</li> <li>(2) A Comprehensive Assessment System;</li> <li>(3) Early Childhood Educator qualifications;</li> <li>(4) Family engagement strategies;</li> <li>(5) Health promotion practices; and</li> <li>(6) Effective data practices;</li> </ol> <p>(b) Is clear and has standards that are measurable, meaningfully differentiate program quality levels, and reflect</p>		

high expectations of program excellence commensurate with nationally recognized standards that lead to improved learning outcomes for children; and

(c) Is linked to the State licensing system for Early Learning and Development Programs.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (B)(1)**

In 2009, the PRSAC directed ARRA funds to be used to pilot a Tiered Quality Rating and Improvement System using a set of tiered Program Standards. The resulting TQRIS, called Pasitos (baby steps), is based on PR's Early Learning and Development Standards the "Estandares de Contenido Y Expectativas de Grado" covering children from birth to 4 years and 11 months. The Estandares revised in 2010, are specific for three preschool age groups and are based on research and the widely recognized Developmentally Appropriate Practice framework of the National Association for the Education of Young Children (NAEYC). PR doesn't have a Comprehensive Assessment System. The pilot of Pasitos collects data on program quality but collection of critical data on children's progress is inconsistent across programs and data can not be shared. Pasitos defines progressively more rigorous qualifications for Early Childhood Educators for each of the 5 tiers in Standard 6.1 - Teachers. However, PR does not have a Workforce Core Knowledge Framework providing the foundation for the Pasitos staff qualifications. Pasitos Standards also incorporate family engagement strategies and child assessments used to adapt the program's curriculum, environment and teaching practices; however, the choice of family engagement strategies and child assessment tools is left up to the individual programs. Pasitos Standards incorporate health promotion and protection and infectious disease prevention in all 5 tiers utilizing the "Guías de Servicios Preventivos Pediatricos" developed by the Department of Health. In addition to the Health Promotion and Protection Standard of Pasitos, the "Guías" provide Early Learning and Development Programs with guidelines for health promotion practices and policies and established a universal screening tool for developmental delays, the Ages and Stages questionnaire. The Pasitos Standards were developed by experts in the field and stakeholders who were invited to attend focus groups to provide comments by mail and email. The monitoring system developed for Pasitos adopts the NAEYC Accreditation framework of program self-study and on-site reviews. However, unlike NAEYC where the validation of the program's portfolio and an on-site program review are conducted by trained validators who do not have a relationship with anyone associated with the program, Puerto Rico's TQRIS utilizes a mentoring process where mentors both work with programs on their improvement plans and also evaluate the program. This sets up an inherent conflict of interest. An outside evaluation using a valid and reliable tool and raters with inter-rater reliability has not been conducted to determine whether the tiers meaningfully differentiate program quality levels. The ratings for programs in the pilot were predominantly in the top tiers: 77 were rated 4's and 1 rated a 5. Without a valid and reliable outside evaluation, it is not clear whether most programs in Puerto Rico provide top tier quality services, whether the tiers meaningfully differentiate quality and whether the mentors who are also raters could contribute to skewing the ratings. Puerto Rico's State Plan includes moving to link the State licensing system for Early Learning and Development Programs with Pasitos. However, no details for how they would move this forward are included and it's unclear whether family, friend and neighbor caregivers would be included in licensing. Based on PR's partially implementation and medium quality response, they received a score of 6.

	Available	Score
<b>(B)(2) Promoting participation in the State's Tiered Quality Rating and Improvement System</b>	<b>15</b>	<b>6</b>

The extent to which the State has maximized, or has a High-Quality Plan to maximize, program participation in the State's Tiered Quality Rating and Improvement System by--

(a) Implementing effective policies and practices to reach the goal of having all publicly funded Early Learning and Development Programs participate in such a system, including programs in each of the following categories--

- (1) State-funded preschool programs;
- (2) Early Head Start and Head Start programs;
- (3) Early Learning and Development Programs funded under section 619 of part B of IDEA and part C of IDEA;
- (4) Early Learning and Development Programs funded under Title I of the ESEA; and
- (5) Early Learning and Development Programs receiving funds from the State's CCDF program;

(b) Implementing effective policies and practices designed to help more families afford high-quality child care and maintain the supply of high-quality child care in areas with high concentrations of Children with High Needs (e.g., maintaining or increasing subsidy reimbursement rates, taking actions to ensure affordable co-payments, providing incentives to high-quality providers to participate in the subsidy program); and

(c) Setting ambitious yet achievable targets for the numbers and percentages of Early Learning and Development Programs that will participate in the Tiered Quality Rating and Improvement System by type of Early Learning and Development Program (as listed in (B)(2)(a)(1) through (5) above).

Scoring Rubric Used: **Quality and Implementation**

**Comments on (B)(2)**

Puerto Rico plans on expanding their TQRIS to Head Start and Early Head Start programs over the next 5 years but they do not include incorporating state-funded preschool programs or Early Learning and Development Programs funded under section 619 of part B of IDEA and part C of IDEA. One of the challenges they face in expanding to include Head Start and Early Head Start Programs is that these programs have not been required to be licensed. Requiring all Head Start and Early Head Start programs to be licensed by 2014-2015 so that they can be incorporated into Pasitos will be a huge effort and require significant licensing resources which is addressed in their budget for licensing. Programs located in the 25 areas with the highest concentration of High Needs Children will be offered free technical assistance for participation in Pasitos. The Participating State Agency ACUDEN is charged with developing additional incentives for programs to participate in Pasitos but the State Plan doesn't include any details. ACUDEN will also study and recommend changes to CCDF to increase the affordability of high quality programs but again, the plan does not provide any details. In their plan, the State started with a small number of programs as their baseline (50) and ramped this up to 300 by 2015, and of the 300, only 126 Head Start and Early Head Start programs out of a total of 1,872 will be participating. While these targets appear to be very achievable, they don't seem ambitious because 300 programs is only 6% of the total programs in PR. Also, they determined projections of how many programs would be added to Pasitos over the next 5 years using the same mathematical calculation for all program sectors with no discussion of why recruitment of programs across sectors would be exactly the same, which does not seem credible. Based on partial implementation and a medium quality plan, the response to this criteria scored 6.

	Available	Score
<b>(B)(3) Rating and monitoring Early Learning and Development Programs</b>	15	6

The extent to which the State and its Participating State Agencies have developed and implemented, or have a High-Quality Plan to develop and implement, a system for rating and monitoring the quality of Early Learning and Development Programs participating in the Tiered Quality Rating and Improvement System by--

- (a) Using a valid and reliable tool for monitoring such programs, having trained monitors whose ratings have an acceptable level of inter-rater reliability, and monitoring and rating the Early Learning and Development Programs with appropriate frequency; and
- (b) Providing quality rating and licensing information to parents with children enrolled in Early Learning and Development Programs (e.g., displaying quality rating information at the program site) and making program quality rating data, information, and licensing history (including any health and safety violations) publicly available in formats that are easy to understand and use for decision making by families selecting Early Learning and Development Programs and families whose children are enrolled in such programs.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (B)(3)**

The program levels and rating strategy Puerto Rico uses for its TQRIS, Pasitos, have several weaknesses. The Pasitos Standards' 5 tiers have not been validated by an outside review of their reliability across programs and validity for measuring progressively higher program quality. Pasitos also involves self-study and mentoring as part of the process to award program ratings. The evaluation of the program's portfolio and on-site review are conducted by mentors who also work with programs to develop and implement program improvement plans. To avoid even the appearance of conflicts of interest, mentors should not be raters and raters should not have relationships with anyone in the program they are evaluating. Without a valid and reliable outside evaluation, it is not clear whether the raters who also have mentoring relationships with the programs might be skewing the ratings. Puerto Rico's plans for providing parents with information about the TQRIS and licensing are generally good but incomplete. Providing workshops for families is mentioned but with no details for how many, where, who the target audiences would be, etc. The State also plans to build on their "Invest in Us" media campaign, employing billboards and print media to reach parents with information about Pasitos as well as the importance of early childhood development. Another outreach strategy in their plan is to provide parents with information about the TQRIS uses a website. While the plans for the website, which has not gone live yet, are sound for reaching parents, particularly younger, urban parents, their plan would be strengthened if they included information about how many families with High Needs Children have access to the internet and the breakdown by age groups so that the website messaging can be targeted to increase its effectiveness. PR's State Plan doesn't address assisting programs with directly marketing their rating and/or licensing status to parents. The deficiencies in the validity of the tiers and rater reliability for Pasitos and weaknesses in the plans for parent information along with the lack of details for goals, key activities, personnel responsible, adequate resources, and evaluation results in a partially implemented medium quality score of 6.

	Available	Score
<b>(B)(4) Promoting access to high-quality Early Learning and Development Programs for Children with High Needs</b>	20	9

The extent to which the State and its Participating State Agencies have developed and implemented, or have a High-Quality Plan to develop and implement, a system for improving the quality of the Early Learning and Development Programs participating in the Tiered Quality Rating and Improvement System by--

- (a) Developing and implementing policies and practices that provide support and incentives for Early Learning and Development Programs to continuously improve (e.g., through training, technical assistance, financial rewards or incentives, higher subsidy reimbursement rates, compensation);

(b) Providing supports to help working families who have Children with High Needs access high-quality Early Learning and Development Programs that meet those needs (e.g., providing full-day, full-year programs; transportation; meals; family support services); and

(c) Setting ambitious yet achievable targets for increasing--

(1) The number of Early Learning and Development Programs in the top tiers of the Tiered Quality Rating and Improvement System; and

(2) The number and percentage of Children with High Needs who are enrolled in Early Learning and Development Programs that are in the top tiers of the Tiered Quality Rating and Improvement System.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (B)(4)**

The State's strategies to promote continuous program improvement could be effective but more detail is needed here. Their State Plan includes providing free training and scholarships for CDA credentials and post secondary degrees, targeted technical assistance for programs in the 25 areas identified with high concentrations of High Needs Children, and other financial incentives for both programs and parents that are not fully fleshed out in their plan. PR plans for helping working families who have Children with High Needs access high-quality Early Learning and Development Programs would also benefit from having more details about the supports and services the State and programs will provide families. Puerto Rico did not expand Pasitos to state funded pre-kindergarten, Title I and IDEA classrooms or to family, friend and neighbor caregivers. PR also set a modest target of 2,520 children, or 6 percent of the total enrolled 38,608 High Needs Children in Head Start and Early Head Start programs in the top tiers of Pasitos by 2015. Although these programs need to be licensed before they can participate in Pasitos, they already undergo thorough, rigorous reviews based on the comprehensive Head Start Performance Standards and would be expected to be able to meet the Pasitos Standards without much of a stretch. Their targets for increasing the number of CCDF programs in the top tiers of Pasitos by 2015 in the performance measures chart (B)(4)(c)(1) appear to be incorrect. Their targets for increasing the number of Children with High Needs who are enrolled in top tier programs, 1,536 High Needs Children out of 19,806 or 7.8 percent, is a slightly more ambitious target than for Head Start programs. The State's calculation for the projections of the number of programs in top tier ratings are based on the results of the Pasitos pilot in which 78 of the 99 participating centers received top tier ratings. However, at this point it is unclear if the tiers meaningfully differentiate quality and if using mentors who help programs to improve and also rate the same program results in ratings that are accurate and reliable. Based on the lack of details for targets, key activities, timelines, personnel responsible, and adequate resources to complete the activities, this section was a partially implemented medium quality score of 9.

	Available	Score
<b>(B)(5) Validating the effectiveness of the State Tiered Quality Rating and Improvement System.</b>	15	5

The extent to which the State has a High-Quality Plan to design and implement evaluations--working with an independent evaluator and, when warranted, as part of a cross-State evaluation consortium--of the relationship between the ratings generated by the State's Tiered Quality Rating and Improvement System and the learning outcomes of children served by the State's Early Learning and Development Programs by--

(a) Validating, using research-based measures, as described in the State Plan (which also describes the criteria that the State used or will use to determine those measures), whether the tiers in the State's Tiered Quality Rating and Improvement System accurately reflect differential levels of program quality; and

(b) Assessing, using appropriate research designs and measures of progress (as identified in the State Plan), the extent to which changes in quality ratings are related to progress in children's learning, development, and school readiness.

Scoring Rubric Used: **Quality**

**Comments on (B)(5)**

To determine whether the 5 tiers in Pasitos meaningfully differentiate program quality levels requires an outside evaluation using a valid and reliable tool and raters with inter-rater reliability. There is also no connection of the tiers to child outcomes. Without a valid and reliable outside evaluation, it is not clear if the tiers meaningfully differentiate quality. PR doesn't present a plan for full validity and reliability of the Pasitos. Also, in their narrative on validating the effectiveness of the Pasitos pilot study, PR uses "validated" to mean agreed upon by experts, focus groups, etc. instead of "validity" as a research measure that tests if the tool measures what it purports to measure, i.e., progressively higher quality across the tiers. This difference in definitions underlies their strategies for using appropriate research designs and measures of progress. Their plan to contract an external evaluator to conduct child assessments in the pilot classrooms and compare the results to the programs' ratings could benefit from a deeper understanding of the factors that may impact this approach. The response to this criteria is a medium/low quality score of 5.

**Focused Investment Areas (C), (D), and (E)**

Each State must address in its application--

- (1) Two or more of the selection criteria in Focused Investment Area (C);
- (2) One or more of the selection criteria in Focused Investment Area (D); and
- (3) One or more of the selection criteria in Focused Investment Area (E).

The total available points for each Focused Investment Area will be divided by the number of selection criteria that the applicant chooses to address in that area, so that each selection criterion is worth the same number of points.

**C. Promoting Early Learning and Development Outcomes for Children**

The total available points that an applicant may receive for selection criteria (C)(1) through (C)(4) is 60. The 60 points will be divided by the number of selection criteria that the applicant chooses to address so that each selection criterion is worth the same number of points. For example, if the applicant chooses to address all four selection criteria under this Focused Investment Area, each criterion will be worth up to 15 points. If the applicant chooses to address two selection criteria, each criterion will be worth up to 30 points.

The applicant must address at least two of the selection criteria within Focused Investment Area (C), which are as follows:

	Available	Score
<b>(C)(1) Developing and using statewide, high-quality Early Learning and Development Standards.</b>	<b>15</b>	<b>9</b>
<p>The extent to which the State has a High-Quality Plan to put in place high-quality Early Learning and Development Standards that are used statewide by Early Learning and Development Programs and that--</p> <ul style="list-style-type: none"> <li>(a) Includes evidence that the Early Learning and Development Standards are developmentally, culturally, and linguistically appropriate across each age group of infants, toddlers, and preschoolers, and that they cover all Essential Domains of School Readiness;</li> <li>(b) Includes evidence that the Early Learning and Development Standards are aligned with the State's K-3 academic standards in, at a minimum, early literacy and mathematics;</li> <li>(c) Includes evidence that the Early Learning and Development Standards are incorporated in Program Standards, curricula and activities, Comprehensive Assessment Systems, the State's Workforce Knowledge and Competency Framework, and professional development activities; and</li> <li>(d) The State has supports in place to promote understanding of and commitment to the Early Learning and Development Standards across Early Learning and Development Programs.</li> </ul> <p>Scoring Rubric Used: <b>Quality and Implementation</b></p>		
<b>Comments on (C)(1)</b>		
<p>PR states that the Early Learning and Development Standards are based on the widely accepted Developmentally Appropriate Practice Guidelines of the National Association for the Education of Young Children (NAEYC) as evidence that they are developmentally, culturally, and linguistically appropriate across the age groups infants, toddlers, and preschoolers, and that they cover all Essential Domains of School Readiness. The application also provides evidence that the Standards for preschoolers are aligned with K-3 academic standards in early literacy and mathematics. The Pasitos pilot based the tiered Standards for programs on the Early Learning Content Standards. PR does not have a Comprehensive Assessment System (CAS) or a Workforce Knowledge and Competency Framework. The schematic provided in their CAS plan illustrates their intent for continuous child assessment to inform the Early Learning and Development Standards, Workforce data, and the Pasitos Program Standards. The Ages and Stages Questionnaire is currently promoted as a universal screener and results are shared with other services for follow up with parental permission. However, follow up is uncoordinated and the Performance Measures in their application show very small percentages of children receiving follow up services. PR also references including the Early Learning and Development Standards in training and curriculum manuals developed to promote understanding of and commitment to the Early Learning and Development Standards for curriculum development and activities. The manuals are also used in the Developing Learning Environments (PAT) training for informal, unlicensed providers. Details such as goals for the number of programs and providers to be trained, hours and formats for the training, who will deliver training, costs and training evaluation are not provided in the State Plan. This partially implemented medium quality plan scores 9.</p>		
<b>(C)(2) Supporting effective uses of Comprehensive Assessment Systems.</b>	<b>15</b>	<b>0</b>



The extent to which the State has a High-Quality Plan to support the effective implementation of developmentally appropriate Comprehensive Assessment Systems by--

- (a) Working with Early Learning and Development Programs to select assessment instruments and approaches that are appropriate for the target populations and purposes;
- (b) Working with Early Learning and Development Programs to strengthen Early Childhood Educators' understanding of the purposes and uses of each type of assessment included in the Comprehensive Assessment Systems;
- (c) Articulating an approach for aligning and integrating assessments and sharing assessment results, as appropriate, in order to avoid duplication of assessments and to coordinate services for Children with High Needs who are served by multiple Early Learning and Development Programs; and
- (d) Training Early Childhood Educators to appropriately administer assessments and interpret and use assessment data in order to inform and improve instruction, programs, and services.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (C)(2)**

Puerto Rico does not have a Comprehensive Assessment System and their narrative recognizes that the lack of a coherent data system is a major weakness. Their current assessments of children in state funded pre-kindergarten are missing measures of environmental quality and teacher-child interactions and their Kindergarten Readiness Assessment does not have evidence for validity with children with disabilities. PR has identified the Ages and Stages Questionnaire (ASQ) as a universal tool for assessing children even though the (ASQ) is a screening tool. PR's plan for developing a Comprehensive Assessment System (CAS) discusses aligning and integrating assessments across programs and Participating State Agencies and sharing assessment results but they leave out goals, key activities, timelines and benchmarks for completion of the activities. They mention providing training to strengthen Early Childhood Educators' understanding of the purposes and uses of each type of assessment and to appropriately administer, interpret and use assessment data to inform and improve instruction, programs, and services. However, detailed plans are not provided. Data from their Kindergarten Readiness Assessment, Escala de Observacion para Kindergarten, is not entered into the education system's Student Information System. The State's lack of a track record in developing some of the foundational components including a statewide data system and SLDS, reduces the likelihood of successful completion of a CAS within the planned time frame. This minimally implemented low quality plan scores 0.

	Available	Score
<b>(C)(3) Identifying and addressing the health, behavioral, and developmental needs of Children with High Needs to improve school readiness.</b>	15	5

The extent to which the State has a High-Quality Plan to identify and address the health, behavioral, and developmental needs of Children with High Needs by--

- (a) Establishing a progression of standards for ensuring children's health and safety; ensuring that health and behavioral screening and follow-up occur; and promoting children's physical, social, and emotional development across the levels of its Program Standards;
- (b) Increasing the number of Early Childhood Educators who are trained and supported on an on-going basis in meeting the health standards;
- (c) Promoting healthy eating habits, improving nutrition, expanding physical activity; and
- (d) Leveraging existing resources to meet ambitious yet achievable annual targets to increase the number of Children with High Needs who--
  - (1) Are screened using Screening Measures that align with the Medicaid Early Periodic Screening, Diagnostic and Treatment benefit (see section 1905(r)(5) of the Social Security Act) or the well-baby and well-child services available through the Children's Health Insurance Program (42 CFR 457.520), and that, as appropriate, are consistent with the Child Find provisions in IDEA (see sections 612(a)(3) and 635(a)(5) of IDEA);
  - (2) Are referred for services based on the results of those screenings, and where appropriate, received follow-up; and
  - (3) Participate in ongoing health care as part of a schedule of well-child care, including the number of children who are up to date in a schedule of well-child care.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (C)(3)**

Puerto Rico's reform agenda builds on the system components they have in place for ensuring children's health and safety. The Puerto Rico Department of Health developed a series of screenings, medical evaluations and interventions to facilitate early detection of health issues and developmental delays. The resulting "Guías de Servicios Preventivos Pediátricos" provides Early Learning and Development Programs with guidelines for practices and policies and established a universal screening tool for developmental delays, the Ages and Stages Questionnaire. Promoting children's physical, social, and emotional development are incorporated across the levels of the Standards in the TQRIS, Pasitos. A specific standard of Pasitos is "Health promotion and prevention and control of infectious disease." However, PR has not adopted a specific set of standards for ensuring children's health and safety in Early Learning and Development Programs. PR's narrative also discusses training to increase the number of Early Childhood Educators who are trained and supported on an on-going basis in meeting the health standards, promoting healthy eating habits, improving nutrition, and expanding physical activity. Programs participating in Pasitos receive training as part of their participation. However, they provide no other target goals or training details for other programs. Crucial details of their activities are not provided in their plan, including how they will ensure that health and behavioral screening and follow-up occur and if children are screened using Screening Measures that align with the Medicaid Early Periodic Screening, Diagnostic and Treatment benefit of the Social Security Act or the well-baby and well-child services available through the Children's Health Insurance Program (42 CFR 457.520), and that, as appropriate, are consistent with the Child Find provisions in IDEA (sections 612(a)(3) and 635(a)(5) of IDEA). Their performance measures for leveraging existing resources to meet annual statewide targets appear to be achievable but not ambitious. At the end of the 5 year period, they project that only 28% of High Needs Children will be screened, only 3.5 % referred on services receive follow-up/treatment, and 27% of High Needs Children participate in a schedule of well child care. They also do not have baseline data on the number of children who participate in a schedule of well child care part of a schedule of well-child care, including the number of children who are up to date. -- A partial strength of PR's response to this criteria is the Positive Parenting Skills Workshops they provide to intensify family protective factors from a strengths based perspective. But PR's plan doesn't specify how many parents are reached through this strategy, how many trainers they have, what the costs are and what results have been measured. An initiative by the Department of Health, the School for Healthy Living and Parenting, promotes health, nutrition and mental health. This appears to be a sound strategy for reaching parents of young children but the State Plan does not provide enough detail to know how many families with Children with High Needs participate. They also propose an innovative Born to Learn initiative but the description does not make a clear link to the goal of increasing High Needs Children's physical activity to support their kindergarten readiness. Born to Learn, a joint project of the Department of Recreation and the United Way, would transform parks and recreational areas into "Born to Learn Parks." However, the idea lacks sufficient detail in the narrative and budget to determine the impact on High Needs Children. No details are provided on how many High Needs Children are projected to use the parks and how training staff to lead sports and physical activities in these special parks will focus on increasing High Needs Children's kindergarten readiness. This partially implemented medium quality response scores 5.

	Available	Score
<b>(C)(4) Engaging and supporting families.</b>	<b>15</b>	<b>6</b>
<p>The extent to which the State has a High-Quality Plan to provide culturally and linguistically appropriate information and support to families of Children with High Needs in order to promote school readiness for their children by--</p> <p>(a) Establishing a progression of culturally and linguistically appropriate standards for family engagement across the levels of its Program Standards, including activities that enhance the capacity of families to support their children's education and development;</p> <p>(b) Increasing the number and percentage of Early Childhood Educators trained and supported on an on-going basis to implement the family engagement strategies included in the Program Standards; and</p> <p>(c) Promoting family support and engagement statewide, including by leveraging other existing resources such as through home visiting programs, other family-serving agencies, and through outreach to family, friend, and neighbor caregivers.</p>		

Scoring Rubric Used: **Quality and Implementation**

Comments on (C)(4)
<p>PR has not developed a set of Standards for Family Engagement but they plan to develop a progression of culturally and linguistically appropriate standards for family engagement across the levels of Pasitos Program Standards, including activities that enhance the capacity of families to support their children's education and development. PR's current activities demonstrate a strong commitment to engaging families in understanding Early Learning and Development Standards to enhance the capacity of families to support their children's education and development. Early Learning and Development Programs provide a plethora of information and services to educate and engage with families. The State Plan's strategies also include trainings, Home Visiting, media campaigns, websites, leadership from local Home Visiting Participants Committees, and regional resource and referral offices known as CENTRANAS. Training is developed from a strengths based model incorporating family goal setting. Details for targets, key activities, timelines, trainers, and the resources needed are not included in their plan. The Pasito utilizes mentors to work with programs to ensure that they understand and implement the family engagement practices included in Pasitos. PR also plans to increase the number and percentage of Early Childhood Educators trained and supported on an on-going basis to implement the family engagement strategies included in the Program Standards. However, they do not provide details for targets, key activities, timelines, trainers, or the resources needed to meet the targets. Through leveraging their Home Visiting program and the PAT Developing Learning Environments program, PR's plans promote family support and engagement statewide and provides outreach to family, friend, and neighbor caregivers. Again, they do not provide details for goals, key activities, timelines, personnel responsible, or the resources needed to complete their goals.</p>

This is partially implemented medium quality response scores 6.

**D. A Great Early Childhood Education Workforce**

The total points that a State may earn for selection criteria (D)(1) and (D)(2) is 40. The 40 points will be divided by the number of selection criteria that the applicant chooses to address so that each selection criterion is worth the same number of points. For example, if the applicant chooses to address both selection criteria under this Focused Investment Area, each criterion will be worth up to 20 points. If the applicant chooses to address one selection criterion, the criterion will be worth up to 40 points.

The applicant must address at least one of the selection criteria within Focused Investment Area (D), which are as follows:

	Available	Score
<b>(D)(1) Developing a Workforce Knowledge and Competency Framework and a progression of credentials.</b>	20	8
<p>The extent to which the State has a High-Quality Plan to--</p> <p>(a) Develop a common, statewide Workforce Knowledge and Competency Framework designed to promote children's learning and development and improve child outcomes;</p> <p>(b) Develop a common, statewide progression of credentials and degrees aligned with the Workforce Knowledge and Competency Framework; and</p> <p>(c) Engage postsecondary institutions and other professional development providers in aligning professional development opportunities with the State's Workforce Knowledge and Competency Framework.</p> <p>Scoring Rubric Used: <b>Quality and Implementation</b></p> <p><b>Comments on (D)(1)</b></p> <p>Puerto Rico's plan recognizes the need to develop a common, statewide Workforce Knowledge and Competency Framework and provides very general plans for development of the standards. They reference six assumptions about professional development for the early childhood workforce from the National Professional Development Center on Inclusion. Their plan is strengthened by the strategy for ACUDEN to develop a Puerto Rico Childhood Workforce Institute to design, develop and evaluate the professional development credentialing system for teachers, child care providers, visiting nurses, social workers, and others in support positions for early childhood learning and development. The Institute, in coordination with the Early Childhood State Advisory Council and the Council of Education, will also develop professional competencies for different levels for early childhood personnel preparation, both pre-service and in-service. Each level will include observable criteria for appropriate practice. They also address the lack of coordination and a coherent progression among the 27 credentials and degrees currently offered. They plan to bring together representatives of the post secondary institutions and other professional development providers to align professional development opportunities with the Pastisos Standards and the State's Workforce Knowledge and Competency Framework as it's being developed. Their intent is to align education and training with the Early Learning and Development Standards and the Pasitos Standards for programs. However, they provide minimal evidence of how this alignment will be achieved. The State Plan recognizes the cultural differences among the various sectors of the workforce and post secondary institutions and the challenge this poses for achieving the goal of alignment across all education and training organizations. The State plans to provide information and bring the leaders in the institutions and sectors together to promote understanding of their roles and contributions to children's learning and development. Developing the Workforce Knowledge and Competency Framework while they're also working with the array of educational institutions and training providers is ambitious but achievable. However, PR does not provide plan details including key strategies, personnel responsible, timelines, benchmarks, and the resources needed to achieve their goals. This minimally implemented medium quality response scores 8.</p>		

	Available	Score
<b>(D)(2) Supporting Early Childhood Educators in improving their knowledge, skills, and abilities.</b>	20	8
<p>The extent to which the State has a High-Quality Plan to improve the effectiveness and retention of Early Childhood Educators who work with Children with High Needs, with the goal of improving child outcomes by--</p> <p>(a) Providing and expanding access to effective professional development opportunities that are aligned with the State's Workforce Knowledge and Competency Framework;</p> <p>(b) Implementing policies and incentives (e.g., scholarships, compensation and wage supplements, tiered reimbursement rates, other financial incentives, management opportunities) that promote professional improvement and career advancement along an articulated career pathway that is aligned with the Workforce Knowledge and Competency Framework, and that are designed to increase retention;</p> <p>(c) Publicly reporting aggregated data on Early Childhood Educator development, advancement, and retention; and</p>		

(d) Setting ambitious yet achievable targets for--

(1) Increasing the number of postsecondary institutions and professional development providers with programs that are aligned to the Workforce Knowledge and Competency Framework and the number of Early Childhood Educators who receive credentials from postsecondary institutions and professional development providers that are aligned to the Workforce Knowledge and Competency Framework; and

(2) Increasing the number and percentage of Early Childhood Educators who are progressing to higher levels of credentials that align with the Workforce Knowledge and Competency Framework.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (D)(2)**

Puerto Rico is in the planning stage for providing and expanding access to effective professional development opportunities aligned with a Workforce Knowledge and Competency Framework because the Competency Framework is not yet developed. PR plans to develop an articulated career pathway that is aligned with the Workforce Knowledge and Competency Framework. They mention incentives for training but do not elaborate. Only two colleges offer courses for early educators of children birth to age 3 but the State Plan does not address how professional development for educators with babies and toddlers will be expanded. They also explain that Early Childhood Educators can not access CDA training because it is unaffordable or inaccessible. They plan on continuing to provide CDA scholarships so that the training is more affordable but they do not address how they will mitigate accessibility issues, for example, locations, times and days of the week offered, and availability of child care. They also do not address compensation enhancements linked with training to promote career advancement and to retain educators in the field. Specifics about Pasitos' tiered reimbursement rates linked to the different levels and requirements for provider education are not provided in their application. Since PR has no Workforce Knowledge Competency Framework, they have no baseline figures for the number and percentage of post-secondary institutions and other professional development providers "aligned" with the Competency Framework. The first year of the grant (2012) will be focused on developing the Framework. The ramp up during the next 3 years is quite ambitious - from 30% to 100%. The ramp up for the number and percentage of Early Childhood Educators receiving credentials aligned with the Competency Framework from 284 to 400 seems less ambitious and very achievable. They also do not explain why their projections for increasing the number and percentage of Early Childhood Educators who are progressing to higher levels of credentials aligned with the Competency Framework only includes the CDA credential. The PRSAC is currently developing a data system for information on ELDD programs. The State's plan would be strengthened if they provided more detail on how the planned data system will be used by early educators to inform instruction and practice. Their plan also states that the ELDD data system will enable them to increase the number of providers where they are most needed but doesn't explain what incentives or supports will be used to ensure an adequate number of providers where they need them. This is a partially implemented medium quality response scored 8.

**E. Measuring Outcomes and Progress**

*The total points an applicant may earn for selection criteria (E)(1) and (E)(2) is 40. The 40 points will be divided by the number of selection criteria that the applicant chooses to address so that each selection criterion is worth the same number of points. For example, if the applicant chooses to address both selection criteria under this Focused Investment Area, each criterion will be worth up to 20 points. If the applicant chooses to address one selection criterion, the criterion will be worth up to 40 points.*

*The applicant must address at least one of the selection criteria within Focused Investment Area (E), which are as follows:*

	Available	Score
<b>(E)(1) Understanding the status of children's learning and development at kindergarten entry.</b>	20	4

The extent to which the State has a High-Quality Plan to implement, independently or as part of a cross-State consortium, a common, statewide Kindergarten Entry Assessment that informs instruction and services in the early elementary grades and that--

(a) Is aligned with the State's Early Learning and Development Standards and covers all Essential Domains of School Readiness;

(b) Is valid, reliable, and appropriate for the target population and for the purpose for which it will be used, including for English learners and children with disabilities;

(c) Is administered beginning no later than the start of school year 2014-2015 to children entering a public school kindergarten; States may propose a phased implementation plan that forms the basis for broader statewide implementation;

(d) Is reported to the Statewide Longitudinal Data System, and to the early learning data system, if it is separate from the Statewide Longitudinal Data System, as permitted under and consistent with the requirements of Federal, State, and local privacy laws; and

(e) Is funded, in significant part, with Federal or State resources other than those available under this grant, (e.g., with funds available under section 6111 or 6112 of the ESEA).

Scoring Rubric Used: **Quality and Implementation**

**Comments on (E)(1)**

Puerto Rico has 10 years of experience with the Department of Education's Kindergarten Entry Assessment. Their plan does not include changing the current assessment which they state is aligned with the Early Learning and Development Standards in Early Literacy, Approached Towards Learning, Cognitive Knowledge and Math Concepts. It is not clear from the evidence provided that their KEA is a valid and reliable tool appropriate for the target population or whether the teachers who administer the observations have inter-rater reliability on the tool. They also note that the KEA has not been validated for use with children with disabilities. – Kindergarten teachers administer PR's current observational assessment when children first enter kindergarten. The KRA results data provided in PR's narrative are confusing. The first bar graph labeled "2009-2010 Teacher Observation Scale for Kindergarten Entry" shows children scoring from 2 to 50 on all four KRA categories and extremely low on Cognitive Knowledge and General Concepts-Math. The adjoining bar graph labeled "2009-2010 Formative Assessment Progress Report Results" shows a majority of these children scoring above 80% on the same categories of Language and Literacy, Approaches Toward Learning, Cognitive Knowledge, and General Concepts-Math. The narrative does not explain the significance of the scores or the correlation of the two graphs. All KRA data is collected and reported manually. PR plans to add reporting KRA results to the Student Information System (SIE) and to the proposed early learning data system. They propose no other plans for improving the KEA. This is a substantially implemented low quality plan and scored 4.

	Available	Score
<b>(E)(2) Building or enhancing an early learning data system to improve instruction, practices, services, and policies.</b>	<b>20</b>	<b>12</b>

The extent to which the State has a High-Quality Plan to enhance the State's existing Statewide Longitudinal Data System or to build or enhance a separate, coordinated, early learning data system that aligns and is interoperable with the Statewide Longitudinal Data System, and that either data system--

- (a) Has all of the Essential Data Elements;
- (b) Enables uniform data collection and easy entry of the Essential Data Elements by Participating State Agencies and Participating Programs;
- (c) Facilitates the exchange of data among Participating State Agencies by using standard data structures, data formats, and data definitions such as Common Education Data Standards to ensure interoperability among the various levels and types of data;
- (d) Generates information that is timely, relevant, accessible, and easy for Early Learning and Development Programs and Early Childhood Educators to use for continuous improvement and decision making; and
- (e) Meets the Data System Oversight Requirements and complies with the requirements of Federal, State, and local privacy laws.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (E)(2)**

PR's plans to build a statewide early learning data system are in the early stages but they are building on the work already in progress through a Statewide Longitudinal Data System (SLDS) grant. The State Plan discusses all of the Essential Data Elements provided by the Race to the Top application. Their plans provide a high level framework and demonstrate a deep knowledge of the complexities and challenges of the project. The plan lays out clear goals and approaches to the project along with key activities and implementation phases with specific planning details. They frequently reference using other states' research and technology as appropriate as they seek to define uniform data collection practices, facilitation of exchange of data, and generating information that is timely, relevant, accessible, and easy for Early Learning and Development Programs and Early Childhood Educators to use for continuous improvement and decision making. Their plan demonstrates awareness of the factors that may impact implementation. The plan also notes that their biggest challenge "will be to integrate all concerned and establish the rules of engagement in order to make this a successful project" and reference relying on the leadership and management skills of the SLDS project. While this is a well thought out plan and undertaking development of the early learning system in conjunction with the SLDs makes logical sense. However, the state education system's lack of experience with a project of this magnitude and the work required to complete some of the foundational system components also under development could lead to delaying the timeline. This minimally implemented high quality response scores 12.

	Available	Score
<b>Total Points Available for Selection Criteria</b>	<b>280</b>	<b>115</b>

**Priorities**

Competitive Preference Priorities

	Available	Score
<b>Competitive Preference Priority 2: Including all Early Learning and Development Programs in the Tiered Quality Rating and Improvement System</b>	10	5

Competitive Preference Priority 2 is designed to increase the number of children from birth to kindergarten entry who are participating in programs that are governed by the State's licensing system and quality standards, with the goal that all licensed or State-regulated programs will participate. The State will receive points for this priority based on the extent to which the State has in place, or has a High-Quality Plan to implement no later than June 30, 2015--

(a) A licensing and inspection system that covers all programs that are not otherwise regulated by the State and that regularly care for two or more unrelated children for a fee in a provider setting; provided that if the State exempts programs for reasons other than the number of children cared for, the State may exclude those entities and reviewers will score this priority only on the basis of non-excluded entities; and

(b) A Tiered Quality Rating and Improvement System in which all licensed or State-regulated Early Learning and Development Programs participate.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (P)(2)**

Puerto Rico's State Plan proposes requiring Head Start and Early Head Start programs to be licensed by 2014-2015. Their plan does not propose to license family, friend and neighbor caregivers, which leaves out a large percentage of providers and children. The table Puerto Rico provides as evidence for the programs that would come under Pasitos, their Tiered Quality Rating and Improvement System, does not include state funded pre-k and special needs programs which are not required to be licensed. They do not give an explanation for why these programs are not slated to be included in Pasitos. This partially implemented medium quality plan scores 5.

Priorities

	Available	Yes/No
<b>Competitive Preference Priority 3: Understanding the Status of Children's Learning and Development at Kindergarten Entry</b>	0 or 10	No

To meet this priority, the State must, in its application--

(a) Demonstrate that it has already implemented a Kindergarten Entry Assessment that meets selection criterion (E)(1) by indicating that all elements in Status Table (A)(1)-12 are met; or

(b) Address selection criterion (E)(1) and earn a score of at least 70 percent of the maximum points available for that criterion.

**Comments on (P)(3)**

Puerto Rico's State Plan scored less than 70% on criterion (E)(1); therefore, it does not meet Competitive Preference Priority 3.

Absolute Priority

	Met? Yes/No
<b>Absolute Priority - Promoting School Readiness for Children with High Needs.</b>	No

To meet this priority, the State's application must comprehensively and coherently address how the State will build a system that increases the quality of Early Learning and Development Programs for Children with High Needs so that they enter kindergarten ready to succeed.

The State's application must demonstrate how it will improve the quality of Early Learning and Development Programs by integrating and aligning resources and policies across Participating State Agencies and by designing and implementing a common, statewide Tiered Quality Rating and Improvement System. In addition, to achieve the necessary reforms, the State must make strategic improvements in those specific reform areas that will most significantly improve program quality and outcomes for Children with High Needs. Therefore, the State must address those criteria from within each of the Focused Investment Areas (sections (C) Promoting Early Learning and Development Outcomes for Children, (D) A Great Early Childhood Education Workforce, and (E) Measuring Outcomes and Progress) that it believes will best prepare its Children with High Needs for kindergarten success.

**Comments on Absolute Priority**

Puerto Rico's application for Race to the Top funding does not comprehensively and coherently address plans for building a state system that increases the quality of Early Learning and Development Programs for Children with High Needs so that they enter kindergarten ready to succeed. – While Puerto Rico's State Plan seeks to integrate and align resources and policies across Participating State Agencies through statewide implementation of Pasitos, the Tiered Quality Rating and Improvement System pilot, important details for how the system will be taken to scale across the territory are not provided. Throughout their responses to the criteria, Puerto Rico is missing critical information including goals, key activities, timelines and benchmarks, the parties responsible for implementing each activity and other key personnel assigned to the activity, appropriate financial resources for successful implementation, requested supporting evidence, and specifically how they will meet the needs of Children with High Needs. Their reform agenda includes developing a Workforce Knowledge Framework, aligning training and education with the Framework, and supporting Early Childhood Educators in improving their knowledge, skills, and abilities. To promote early learning and development outcomes for children they propose enhancing their Early Learning and Development Standards and knowledge and commitment of the Standards. While their plan to develop an Early Learning Data System was well developed and provided all of the elements needed, their narrative for developing a Comprehensive Assessment System did not demonstrate a clear understanding of valid and reliable assessment and was missing clear goals, timelines, and benchmarks for successful completion.



Race to the Top – Early Learning Challenge Review



Technical Review Form Page

Application # PR-5032

Peer Reviewer: [Redacted]
Load Monitor: [Redacted]
Support Monitor: [Redacted]
Application Status: Reviewed
Date/Time: 11/17/2011 - 1:04 PM

CORE AREAS (A) and (B)

States must address in their application all of the selection criteria in the Core Areas

A. Successful State Systems

Table with 3 columns: Core Area, Available, Score. Row 1: (A)(1) Demonstrating past commitment to early learning and development, 20, 17. Includes detailed description and sub-points (a) through (d).

Scoring Rubric Used: Quality

Comments on (A)(1)

The application contains all of the completed Tables (A)(1)-1 through (A)(1)-13. (a) Table (A)(1)-4 provides evidence of investments in the early childhood system from 2007 to 2011. The investments in young children with high needs have increased by 14% since 2007, with one of the largest increases being state dollars for special education and related services for children with disabilities, ages 3-5. The investments being made are consistent with the significant number of children living in poverty and identified with developmental delays or disabilities. There is evidence to show the state commitment to investing in young children due to the fact that the funding for the different programs has increased slightly over time. It would be helpful to know state contribution of \$330M in relation to the other federal dollars received not just Temporary Assistance for Needy Families (TANF). The addition the federal funds would provide a more complete picture of the total investments because the historical perspective of children served includes federally funded programs. Explanation is not provided as to why the state doesn't provide a match for CCDF. (b) Table (A)(1)-1 documents that 82% of the children under the age of 6 are living in poverty. Evidence of other high needs children is included in Table (A)(1)-2 and reports the number of children with disabilities, are who homeless and in foster care. The total number of high needs children reported on both tables totals 243,723. Table (A)(1)-3 provides evidence of the number of high needs children being served as 107,435 children which represents about 44% of the high needs children. Table (A)(1)-5 provides evidence of high needs children being served in programs in the state. The number of children being reported as enrolled in the different programs is consistent with the different types of state-funded programs. (c) Significant legislation noted in the application was passed in 2008, entitled Law for the Implementation of Public Policies for Early Childhood (Appendix 1). It established the importance of providing investment in early childhood and provided principles of investing. Major components addressed: Birth Assurance, Health, Arts and Culture, Education, Security and Protection, Family and Sports and Recreation. A strength of this legislation is the inclusiveness of the arts and culture and the guiding principles that inform how investments are made over time. The intent was that these areas would guarantee that children would have the necessary experiences integral to growth and development and ensure young children are ready for school and life. The application documented that there is legislation and policies in place regarding program licensure, implementing a Quality Rating and Improvement System (QRIS)



program and the creation of the Puerto Rico State Advisory Council (PR SAC). One of the first tasks of the Council was to conduct a study about the number of children, under 5, and the needed services. Based on the needs assessment a State Plan was developed. The Administration for the Integral Child Care and Development (ACUDEN) is the lead agency in the state of early learning and development and is responsible for the implementation of the State Plan. The initial legislation passed in 2008 became an important framework to inform and guide subsequent policies around the system building blocks. It was important because it provides guidance ensure not only policies focused on education but the arts, health, protection and security. (d) Some of the key areas were not addressed and others did not provide sufficient detail. As stated in the application and documented in the Appendices, Puerto Rico has had Early Learning Standards since 2002. As documented in Table (A)(1)-6 the standards apply to programs serving children ages birth to 5 and address the essential domains of school readiness. Table (A)(1)-7 documents that Puerto Rico has a comprehensive assessment system integrated in state licensing requirements and the Quality Rating Systems, Little Steps, but it does not apply to all programs. Table (A)(1)-8 documents that all elements of high quality health promotion practices are implemented in state-funded preschool programs, program receiving CCDF funds, and children with special health needs in Title V. The other types of program implement some but not all of the elements. The practice of healthy eating habits and physical activity is the only one incorporated in licensing requirements. As documented in Table (A)(1)-9 state funded preschools, preschool special education and early intervention programs, Head Start and Early Head Start, Title 1 and CCDF funded programs all implement family engagement strategies that include communication strategies, meetings, parent education, sharing child progress, and cultural and social activities. Little Steps (TQRIS) standards require staff to use formal strategies to better understand the families of the children they serve and sharing information with families that help them support the development of their child. State licensing requirements require programs to provide evidence in their bylaws that strategies will be implemented for engaging families in their programs. Table (A)(1)-10 documents the number of early childhood educators that hold a credential. However, it is noted that Puerto Rico does not have a workforce knowledge and competency framework that the credential is aligned to or a progression of credentials. Table (A)(1)-12 documents that a kindergarten entry assessment is implemented statewide but is not valid and reliable for children with disabilities or English learners and the results are not included in the state longitudinal data system. Table (A)(1)-13 documents that there are three data systems in place; PROMISE, CIMS, and SIE. Each of the systems incorporates some of the essential data elements but none of them include all of the elements. As evidenced in the program and initiative descriptions, PR has implemented some aspect of each of the key areas that form the building blocks for a high quality early learning and development system. In addition they clearly acknowledge that there are gaps and or refinements that need to be addressed.

	Available	Score
<b>(A)(2) Articulating the State's rationale for its early learning and development reform agenda and goals.</b>	20	4
<p>The extent to which the State clearly articulates a comprehensive early learning and development reform agenda that is ambitious yet achievable, builds on the State's progress to date (as demonstrated in selection criterion (A)(1)), is most likely to result in improved school readiness for Children with High Needs, and includes--</p> <p>(a) Ambitious yet achievable goals for improving program quality, improving outcomes for Children with High Needs statewide, and closing the readiness gap between Children with High Needs and their peers;</p> <p>(b) An overall summary of the State Plan that clearly articulates how the High-Quality Plans proposed under each selection criterion, when taken together, constitute an effective reform agenda that establishes a clear and credible path toward achieving these goals; and</p> <p>(c) A specific rationale that justifies the State's choice to address the selected criteria in each Focused Investment Area (C), (D), and (E), including why these selected criteria will best achieve these goals.</p>		

Scoring Rubric Used: **Quality**

Comments on (A)(2)
<p>(a) The application does not contain explicit goals for improving program quality improving outcomes for Children with High Needs statewide, and closing the readiness gap between Children with High Needs and their peers. The do describe a process for gathering information for the State Plan to establish priorities but do not translate that information in to key goals, objectives and milestones in a plan. (b) The application narrative documents the aspects of the system needing reform based on the process used to write their State Plan. That process permitted PR to identify their strengths and weaknesses regarding their early learning and development system. The application states that the process resulted in the priorities identified for the High Quality Plan. The narrative states that more training on standards is needed regarding alignment with curricula and the evaluation process; improved process of administering, interpreting and using assessment data; developing a workforce knowledge and competency framework; developing family engagement standards; developing a data system; and an adequate organizational structure to support the system. No evidence is provided to know if the priorities are consistent with the findings of the from the meeting process. The application does not address these activities in the context of a reform agenda and does not provide a high quality plan that addresses each of the selection criterion inn this section. (c) The application identifies the chosen Focused Investment areas in (C), (D) and (E) but no rationale for the selection is provided. PR has provided information about the areas they see needing to be developed or improved upon as a part of the process they used to develop a state plan. That information is logical and reasonable in relation to the information provided in the tables on section A. However, they do not provide a State Plan that contains goals, objectives and timelines to show how they plan on approaching and accomplishing the work around standards training, developing a data system, creating outdoor play spaces, developing and implementing family engagement standards, developing and implementing core knowledge competencies or how to improve the assessment system to ensure better administration and use of the results to improve instruction.</p>

	Available	Score
<b>(A)(3) Aligning and coordinating early learning and development across the State</b>	<b>10</b>	<b>5</b>

The extent to which the State has established, or has a High-Quality Plan to establish, strong participation and commitment in the State Plan by Participating State Agencies and other early learning and development stakeholders by--

(a) Demonstrating how the Participating State Agencies and other partners, if any, will identify a governance structure for working together that will facilitate interagency coordination, streamline decision making, effectively allocate resources, and create long-term sustainability and describing--

(1) The organizational structure for managing the grant and how it builds upon existing interagency governance structures such as children's cabinets, councils, and commissions, if any already exist and are effective;

(2) The governance-related roles and responsibilities of the Lead Agency, the State Advisory Council, each Participating State Agency, the State's Interagency Coordinating Council for part C of IDEA, and other partners, if any;

(3) The method and process for making different types of decisions (e.g., policy, operational) and resolving disputes; and

(4) The plan for when and how the State will involve representatives from Participating Programs, Early Childhood Educators or their representatives, parents and families, including parents and families of Children with High Needs, and other key stakeholders in the planning and implementation of the activities carried out under the grant;

(b) Demonstrating that the Participating State Agencies are strongly committed to the State Plan, to the governance structure of the grant, and to effective implementation of the State Plan, by including in the MOU or other binding agreement between the State and each Participating State Agency--

(1) Terms and conditions that reflect a strong commitment to the State Plan by each Participating State Agency, including terms and conditions designed to align and leverage the Participating State Agencies' existing funding to support the State Plan;

(2) "Scope-of-work" descriptions that require each Participating State Agency to implement all applicable portions of the State Plan and a description of efforts to maximize the number of Early Learning and Development Programs that become Participating Programs; and

(3) A signature from an authorized representative of each Participating State Agency; and

(c) Demonstrating commitment to the State Plan from a broad group of stakeholders that will assist the State in reaching the ambitious yet achievable goals outlined in response to selection criterion (A)(2)(a), including by obtaining--

(1) Detailed and persuasive letters of intent or support from Early Learning Intermediary Organizations, and, if applicable, local early learning councils; and

(2) Letters of intent or support from such other stakeholders as Early Childhood Educators or their representatives; the State's legislators; local community leaders; State or local school boards; representatives of private and faith-based early learning programs; other State and local leaders (e.g., business, community, tribal, civil rights, education association leaders); adult education and family literacy State and local leaders; family and community organizations (e.g., parent councils, nonprofit organizations, local foundations, tribal organizations, and community-based organizations); libraries and children's museums; health providers; and postsecondary institutions.

Scoring Rubric Used: **Quality and Implementation**

#### Comments on (A)(3)

a(1) The application states that the Office of the Governor will designate the appointed Puerto Rico State Advisory Council (PRSAC) as the lead agency managing the governance structure and for administering the RTT-ELC grant. The PRSAC will expand its structure to include expertise in early childhood, legal support and a group of coordinators to guide the compliance process. The PRSAC team will have the direct responsibility of ensuring active participation and collaboration throughout the duration of the implementation plan. An organizational chart is included, in the Appendix-Attachment 14, which documents the relationship of the PRSAC and the participating state agencies. The governance structure as planned is reasonable and builds on the strengths of the State Advisory Council's roles and existing relationships with the state agencies and key stakeholders. a(2) The application states that the PRSAC has identified additional partners: Presidents of legislative standing committees on Education and Family Affairs; a representative of the Judicial System with knowledge in family court matters; Parents of Children with Disabilities Association Consulting Committee on Special Education; Down-Syndrome Association; the Autism Alliance of PR; and university faculty. A formal invitation will be sent to these entities and upon acceptance they will be formally included in the PRSAC meetings and be asked periodically for recommendations. This is a broad group of partners that represents the children with high needs and will be important to accomplishing the projects and initiatives described. a(3) The application states that a formal process

for communication, participation and solving controversies will need to be developed. No specific information is provided. a(4)The application states that the PRSAC has been active in promoting the participation of other important stakeholders and state agencies through a series of discussions and meetings. Three focus groups were convened to include CCDF, Head Start and private child care providers and the Association of Families with Children with Special Needs to address the licensing process, family engagement, professional development and QRIS. The results of those discussions are incorporated in the application. This provides a clear example of experience and and commitment to show how participation of others has been implemented. This is important since the PRSAC will be the lead agency for the RTT-ELC grant with responsibility of ensuring key stakeholders are involved in developing and implementing the activities in the grant. (b) Table (A)(3)-1 documents the participating state agencies and other entities related roles and responsibilities Based on a review of the MOUs and Scope of Work, included in the Appendices, a MOU exists with the Department of Family, Health, Education, the Administration for Integral Child Care and Development, Sports and Recreation, Mental Health, Puerto Rico Council on Education, United Way of Puerto Rico and the Office of General Council for Socioeconomic Financing and Self Management. However, all of these entities do not appear on the list in Table (A)(3)-1. The Head Start Collaboration Office is identified in the Scope of Work but no MOU is included. (c) Letters of Support listed in Table (A)(3)-2 are included in the Appendix Attachment 17-44. The only identified Early Learning Intermediary Organizations is the Head Start Association other key stakeholders are legislators, foundations, local child serving organizations, United Way, the PR Art Museum, the PR Chamber of Commerce, San Gorge Children's Hospital, the University System and the Corporation for Public Broadcasting. Upon a review of the letters they were very general and not specific in supporting the proposed State Plan. The narrative provides sufficient detail as to all of the participating state agencies, the role of the State Advisory Council and the other key stakeholders to be involved. The State Advisory Council as the lead agency for the work clearly shows that PR understands the importance of public private partnerships in accomplishing this type of work. There are discrepancies between the signed MOUs and the Scope of Work (Exhibit 1) The United Way and the Education Council have signed MOUs but are not identified in the Scope of Work. It is not always clear as to who is going to be involved in the work and responsibilities. The narrative explains what PR wants to do align and coordinate the early learning programs but there isn't an articulated plan, with timelines, milestones and financial resources, that shows how this governance structure leads to collaboration and allocation of resources that creates long-term sustainability of the system.

	Available	Score
<b>(A)(4) Developing a budget to implement and sustain the work of this grant.</b>	<b>15</b>	<b>3</b>

The extent to which the State Plan--

(a) Demonstrates how the State will use existing funds that support early learning and development from Federal, State, private, and local sources (e.g., CCDF; Title I and II of ESEA; IDEA; Striving Readers Comprehensive Literacy Program; State preschool; Head Start Collaboration and State Advisory Council funding; Maternal, Infant, and Early Childhood Home Visiting Program; Title V MCH Block Grant; TANF; Medicaid; child welfare services under Title IV (B) and (E) of the Social Security Act; Statewide Longitudinal Data System; foundation; other private funding sources) for activities and services that help achieve the outcomes in the State Plan, including how the quality set-asides in CCDF will be used;

(b) Describes, in both the budget tables and budget narratives, how the State will effectively and efficiently use funding from this grant to achieve the outcomes in the State Plan, in a manner that--

- (1) Is adequate to support the activities described in the State Plan;
- (2) Includes costs that are reasonable and necessary in relation to the objectives, design, and significance of the activities described in the State Plan and the number of children to be served; and
- (3) Details the amount of funds budgeted for Participating State Agencies, localities, Early Learning Intermediary Organizations, Participating Programs, or other partners, and the specific activities to be implemented with these funds consistent with the State Plan, and demonstrates that a significant amount of funding will be devoted to the local implementation of the State Plan; and

(c) Demonstrates that it can be sustained after the grant period ends to ensure that the number and percentage of Children with High Needs served by Early Learning and Development Programs in the State will be maintained or expanded.

Scoring Rubric Used: **Quality**

#### Comments on (A)(4)

(a) The application contains the completed budget table listing the existing funds to be used to achieve the outcomes in the proposed State Plan, Table (A)(4)-1. However, no narrative is provided to explain how these funds will be used for activities and services to achieve the activities described in the reform agenda. Since this table reflects existing funding, it is unclear as to why the sources listed are not included in the historical funding table in Section (A). A significant portion of the budget is paying for personnel and equipment without a clear description as to how it contributes to the work of the proposal. In the Governor's Office budget, Funding being requested for a driver without an explanation as to the need to support the work of the proposal. The budgeted amount in Sports and Recreation to refurbish facilities and develop, mini golf courses, are not linked back to the work in the application. A significant amount is going to be used to purchase materials and equipment for early learning classrooms without explanation for how this expenditure will improve outcomes for children with high needs. (b) Without a State Plan with clear goals and objectives it is difficult to sort out the budget expenditures being proposed. The total budget request is \$119.7M with \$58.9 of those dollars being requested from the RTT-ELC grant funds. As documented in each of the participating state agency budget tables II-2, most of the

budget funding is RTT-ELC with the exception the Department of the Family and Administration for Integral Child Care. Based on the budget narratives it seems like significant dollars are being used for personnel and equipment without a clear rationale for the expenditures. The Department of Sport and Recreation is using dollars to refurbish playground spaces without clarity as to how the expenditures improve early childhood program quality, increase access to services or improve child outcomes. (c) Sustainability is not addressed in the application. With most of the funding to support the projects coming from RTT-ELC funding, there uncertainty as to how the efforts will continue to be implemented and operated once the grant funding has ended.

**B. High-Quality, Accountable Programs**

	Available	Score
<b>(B)(1) Developing and adopting a common, statewide Tiered Quality Rating and Improvement System</b>	10	4

The extent to which the State and its Participating State Agencies have developed and adopted, or have a High-Quality Plan to develop and adopt, a Tiered Quality Rating and Improvement System that--

(a) Is based on a statewide set of tiered Program Standards that include--

- (1) Early Learning and Development Standards;
- (2) A Comprehensive Assessment System;
- (3) Early Childhood Educator qualifications;
- (4) Family engagement strategies;
- (5) Health promotion practices; and
- (6) Effective data practices;

(b) Is clear and has standards that are measurable, meaningfully differentiate program quality levels, and reflect high expectations of program excellence commensurate with nationally recognized standards that lead to improved learning outcomes for children; and

(c) Is linked to the State licensing system for Early Learning and Development Programs.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (B)(1)**

(a) A copy of PR's Program Standards are included in the Appendix as an Attachment. There are nine Program Standards that differentiate program quality levels across five steps. The standards include: Positive Relationships; Child Development; Teaching; Assessment of Child Development; Health and Safety; Teachers; Families; Community Relationships; and Environment. The narrative states that the Standards integrate the Early Learning Content Standards and Guidelines for Pediatric Preventive Services. The application states that these are the only two elements that have been developed. The areas not included are Early Childhood Educator qualifications, Family engagement strategies, and effective data practices. PR recognizes that Program Standards will need to be revised to integrate the family engagement standards that are going to be developed, the changes in the assessment system being proposed, and data practices aligned to the new unified data system and the Core Competencies for early childhood educators. All projects proposed in the application. (b) Based on a review of the Program Standards the requirements for quality progressively increase at each of the five levels. They appear to be measurable and the proposal states that a monitoring instrument is being developed. The child development and health and safety standards are based on PR's health preventative guidelines and their early learning content standards, both of which are research based and reflect nationally recognized standards. The application does not address how the standards lead to improved learning outcomes for children. (c) This criteria is not implemented currently. The application states that linking Program Standards to the licensing standards will be developed later. PR has Program Standards being implemented. Two of the program standards areas are based on recently developed standards in early learning and the health guidelines. Once standards are developed in the other areas the Program Standards will need to be revised. An articulated plan with timelines, milestones and financial resources, that shows how PR plans to maximize program participation in the state QRIS system is not included. Therefore, this section was considered minimally implemented with a medium-quality response.

	Available	Score
<b>(B)(2) Promoting participation in the State's Tiered Quality Rating and Improvement System</b>	15	5

The extent to which the State has maximized, or has a High-Quality Plan to maximize, program participation in the State's Tiered Quality Rating and Improvement System by--

(a) Implementing effective policies and practices to reach the goal of having all publicly funded Early Learning and Development Programs participate in such a system, including programs in each of the following categories--

- (1) State-funded preschool programs;
- (2) Early Head Start and Head Start programs;
- (3) Early Learning and Development Programs funded under section 619 of part B of IDEA and part C of IDEA;
- (4) Early Learning and Development Programs funded under Title I of the ESEA; and
- (5) Early Learning and Development Programs receiving funds from the State's CCDF program;

(b) Implementing effective policies and practices designed to help more families afford high-quality child care and maintain the supply of high-quality child care in areas with high concentrations of Children with High Needs (e.g., maintaining or increasing subsidy reimbursement rates, taking actions to ensure affordable co-payments, providing incentives to high-quality providers to participate in the subsidy program); and

(c) Setting ambitious yet achievable targets for the numbers and percentages of Early Learning and Development Programs that will participate in the Tiered Quality Rating and Improvement System by type of Early Learning and Development Program (as listed in (B)(2)(a)(1) through (5) above).

Scoring Rubric Used: **Quality and Implementation**

**Comments on (B)(2)**

(a) The application indicates the aim of the State Plan is to increase the number of programs participating in TQRIS. Early childhood programs in towns with the highest numbers of high needs children will be encouraged to participate first. This will ensure children and families of highest need will be available but the application does not provide information about ensuring access through policies and practices on subsidy rates or affordable co-payments. The application states that the Licensing Division will be restructured to align to the proposed TQRIS system but it does not explain how or if the licensing requirements will be the base for PR's TQRIS system. The restructuring based on the TQRIS system will require legislation and coordination with other sister agencies. One of the challenges identified for increasing program participation is the fact that Early Head Start and Head Start are currently exempt from state licensing. In order to have a statewide system, Early Head Start (EHS) and Head Start (HS) will be required to be licensed by 2014-2015. The application states the plan is to increase the incentives and educational opportunities for the personnel of the participating programs. Evidence that funds will be allocated to increase the number of incentives and scholarships is contained in Budget Table II-2. PR has not provided a plan with goals, objective, key milestones to ensure the activities described in the proposal will be accomplished. The plan need to address how the program standards appropriately reflect and accommodate for differences in the types of programs and the population of children served. (c) Table (B)(2)(c) documents that 50 programs will be added each year for a total of 300 programs by 2015. The targets are achievable but not ambitious since a total of 300 programs represents approximately 6% of all early learning and development programs in the state.

	Available	Score
<b>(B)(3) Rating and monitoring Early Learning and Development Programs</b>	<b>15</b>	<b>6</b>

The extent to which the State and its Participating State Agencies have developed and implemented, or have a High-Quality Plan to develop and implement, a system for rating and monitoring the quality of Early Learning and Development Programs participating in the Tiered Quality Rating and Improvement System by--

(a) Using a valid and reliable tool for monitoring such programs, having trained monitors whose ratings have an acceptable level of inter-rater reliability, and monitoring and rating the Early Learning and Development Programs with appropriate frequency; and

(b) Providing quality rating and licensing information to parents with children enrolled in Early Learning and Development Programs (e.g., displaying quality rating information at the program site) and making program quality rating data, information, and licensing history (including any health and safety violations) publicly available in formats that are easy to understand and use for decision making by families selecting Early Learning and Development Programs and families whose children are enrolled in such programs.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (B)(3)**

(a) The application states that PR developed an instrument to measure program quality in 2009. There is no evidence in the application to document that a tool is in place. It was inferred from the application that the "Pasitos" is probably the tool as well as the standards. The application states that the Educational Research Center at the University of Puerto Rico developed a rigorous process to design and validate the instrument during a two year period. During the first phase a series of documents and instruments were studied, and the first draft of the instrument was developed. In the second phase, experts in early childhood education evaluated and validated the content of the instrument. During the third phase of the process a pilot study was conducted in 100 early childhood classrooms. The fourth and final phase consisted of designing an electronic data bank and website to provide information to programs, administrators, schools and families. The findings of the study are not contained in the application to be able to verify the statement. The instrument is aligned to the NAEYC quality standards, PR Licensing requirements, Head Start Program Standards, National Health and Safety Standards and the Environment Rating Scale. The instrument validation process consisted of asking early childhood specialists, working in various higher education institutions to serve as evaluators and validate the content. One hundred centers that represent the different types of programs volunteered to participate in a pilot to self-evaluate their programs and prepare an evidence portfolio. There is not evidence to support inter-rater reliability levels have been established. The application does not discuss the monitoring process in much detail. There is information that the pilot programs were monitored 3 times by mentors selected based on qualifications, geographic proximity to programs and experience in early childhood and trained before each visit. However, there is nothing to support that the practice will be continued in other programs after the pilot. It was stated in the application that the monitors provide guidance about the assessment process, validated the self-assessment report, analyzed the data results, discussing the results and assisting the program with developing an improvement plan. This process of the monitor doing both compliance and technical assistance and support raised issues regarding conflict of interest, which should be avoided when the program is implemented. (b) The application states that parents will be educated through an educational media campaign, participating agencies' websites, group orientations and brochures. The layered approach of providing information to parents is a strength of the application. PR needs to develop a process for determining the reliability of the monitoring tool. A process needs to be put in place for regularly determining inter-rater reliability on the application of the tool for determining a star designation. PR needs to develop and plan with goals and objectives identify the financial resources needed to accomplish the goals. Information is also needed that explain how the tool will address the needs of different types of programs and impact outcomes for children with high needs.

	Available	Score
<b>(B)(4) Promoting access to high-quality Early Learning and Development Programs for Children with High Needs</b>	20	4

The extent to which the State and its Participating State Agencies have developed and implemented, or have a High-Quality Plan to develop and implement, a system for improving the quality of the Early Learning and Development Programs participating in the Tiered Quality Rating and Improvement System by--

(a) Developing and implementing policies and practices that provide support and incentives for Early Learning and Development Programs to continuously improve (e.g., through training, technical assistance, financial rewards or incentives, higher subsidy reimbursement rates, compensation);

(b) Providing supports to help working families who have Children with High Needs access high-quality Early Learning and Development Programs that meet those needs (e.g., providing full-day, full-year programs; transportation; meals; family support services); and

(c) Setting ambitious yet achievable targets for increasing--

(1) The number of Early Learning and Development Programs in the top tiers of the Tiered Quality Rating and Improvement System; and

(2) The number and percentage of Children with High Needs who are enrolled in Early Learning and Development Programs that are in the top tiers of the Tiered Quality Rating and Improvement System.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (B)(4)**

(a) The application speaks to the importance of developing a system and the incentives to provide access to families to high-quality programs, especially those parents of children with high needs. The Administration for the Integral Child Care and Development (ACUDEN's) TQRIS unit will develop an incentive program and a follow-up schedule in order to provide technical assistance to programs and monitor their development plan. Based on the information provided in the application, this criterion is not implemented but in the planning phase. The application stated that incentives will be developed but no information is provided as to what the incentives will be and how they will be implemented in the state. (b) The University of Puerto Rico, Educational Research Center developed a database and a website aimed at informing families about the TQRIS for assessing and measuring the quality of programs that address early childhood. The website, is not yet available to the public. It will contain information about participating centers, documents relevant to TQRIS, and information about the quality in early childhood education programs. The application only describes a web-based approach to informing families and the public which is not accessible to individuals who do not have access to the internet. Based on the information provided in the application this criterion is not implemented at this time and the plan is for only providing access to the information in one way, which limits accessibility. (c) The goals and targets set are not ambitious but achievable because they are starting with 100 programs at the beginning of the grant and only work to move those same programs up the tiers by the end of the grant. Forty of the program are the same programs that have been in the pilot. Table (B)(4)(c)(1) documents that currently 100 programs are in the baseline and 99 will be moved to tier 5 by 2015. According to Table(B)(c)(2) 7,819 children will be served in programs that are in the top tiers by 2015.

Currently the plan does not include programs serving children with disabilities or Title 1 funded programs. PR needs to consider how they will increase access in state funded programs and special education programs to increase access to high quality programs for these groups of children with high needs. The application indicates that all of criteria in the application are currently not implement. PR's High-Quality Plan to develop and implement, a system for improving the quality of the Early Learning and Development Programs participating in the Tiered Quality Rating and Improvement System does not include key goals, activities, timelines with key milestones. Resources are included in the budget but it is not clear as to how the expenditures link back to the criteria support the implementation

	Available	Score
<b>(B)(5) Validating the effectiveness of the State Tiered Quality Rating and Improvement System.</b>	15	3

The extent to which the State has a High-Quality Plan to design and implement evaluations--working with an independent evaluator and, when warranted, as part of a cross-State evaluation consortium--of the relationship between the ratings generated by the State's Tiered Quality Rating and Improvement System and the learning outcomes of children served by the State's Early Learning and Development Programs by--

(a) Validating, using research-based measures, as described in the State Plan (which also describes the criteria that the State used or will use to determine those measures), whether the tiers in the State's Tiered Quality Rating and Improvement System accurately reflect differential levels of program quality; and

(b) Assessing, using appropriate research designs and measures of progress (as identified in the State Plan), the extent to which changes in quality ratings are related to progress in children's learning, development, and school readiness.

Scoring Rubric Used: **Quality**

**Comments on (B)(5)**

(a) The application states that content validity was based on experts and focus groups evaluating the alignment of the system to the NAEYC standards, early learning content standards, health and safety standards, Head Start documents and licensing documents. In addition, the pilot study provided information to make improvements in both the instrument and the electronic database under development. The application lacks information explaining how a more rigorous study will be conducted to address whether the tiers accurately reflect differential levels of program quality. (b) The plan is to contract with external evaluators to assess the system functioning and the progress of the 100 classroom participating in the pilot to compile evidence of the relation between the system and child progress. A random sample of the children in the 100 classrooms will be selected for an evaluation of their developmental progress. The evaluation design appears weak because it only focuses on post assessment of the children in pilot. A more rigorous study is needed to determine which changes in the quality ratings are related to progress in children's learning, development and school readiness. PR needs to develop a plan with goals, key activities, timelines and financial resources that will support using the appropriate research designs to differentiate levels of quality and ratings related to child progress.

**Focused Investment Areas (C), (D), and (E)**

Each State must address in its application--

- (1) Two or more of the selection criteria in Focused Investment Area (C),
- (2) One or more of the selection criteria in Focused Investment Area (D); and
- (3) One or more of the selection criteria in Focused Investment Area (E)

The total available points for each Focused Investment Area will be divided by the number of selection criteria that the applicant chooses to address in that area, so that each selection criterion is worth the same number of points.

**C. Promoting Early Learning and Development Outcomes for Children**

The total available points that an applicant may receive for selection criteria (C)(1) through (C)(4) is 60. The 60 points will be divided by the number of selection criteria that the applicant chooses to address so that each selection criterion is worth the same number of points. For example, if the applicant chooses to address all four selection criteria under this Focused Investment Area, each criterion will be worth up to 15 points. If the applicant chooses to address two selection criteria, each criterion will be worth up to 30 points.

The applicant must address at least two of the selection criteria within Focused Investment Area (C), which are as follows:

	Available	Score
<b>(C)(1) Developing and using statewide, high-quality Early Learning and Development Standards.</b>	15	3

The extent to which the State has a High-Quality Plan to put in place high-quality Early Learning and Development Standards that are used statewide by Early Learning and Development Programs and that--

- (a) Includes evidence that the Early Learning and Development Standards are developmentally, culturally, and linguistically appropriate across each age group of infants, toddlers, and preschoolers, and that they cover all Essential Domains of School Readiness;
- (b) Includes evidence that the Early Learning and Development Standards are aligned with the State's K-3 academic standards in, at a minimum, early literacy and mathematics;
- (c) Includes evidence that the Early Learning and Development Standards are incorporated in Program Standards, curricula and activities, Comprehensive Assessment Systems, the State's Workforce Knowledge and Competency Framework, and professional development activities; and
- (d) The State has supports in place to promote understanding of and commitment to the Early Learning and Development Standards across Early Learning and Development Programs.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (C)(1)**

(a) PR has Early Learning Content Standards for children ages birth to 5, which were revised in 2010 by the PR Department of Education. The standards and expectations are based on National Association for the Education of Young Children (NAEYC) developmentally appropriate practices and other relevant research as evidence that all of the essential domains of school readiness are included. The application documents that copies of the standards have been disseminated to the state and federally funded programs but does not indicate that there is a requirement to use the standards to guide practice. (b) The application states that in 2010 the PR Department of Education revised and updated the learning standards and learning objectives for all academic programs, including at the preschool level. The standards are designed to be used as a guide for educational practices in the school environment. According to the application, the standards and expectations are developed starting at the preschool level through twelfth grade for all academic programs. No evidence is provided in the application regarding the alignment of the early learning standards to K-12 standards. In addition, there is no information regarding the infant and toddler standards. (c) The application indicates that a team of trainers will be dedicated to the training of the early learning program directors and educators. However, no explanation is provided as to who the trainers will be and how the training will be implemented. There is information that workshops and professional activities for early childhood education providers are directed towards interpreting the standards and aligning activities in the curricula to the learning expectations. The goal of these professional workshops is to standardize the integration of the standards in curricula of all early childhood education providers in Puerto Rico. The plan also states that the Early Learning Standards will be included as part of the Core Knowledge. In addition, Project TAP: Developing Learning Environment provides family child care home and informal providers with the necessary tools to develop learning environments in their settings. A key component of this project is the provision of information about Early Learning Standards and how to align their daily activities to the standards. The application indicates that legislation will be developed to require all early learning programs to apply the early learning standards in their early learning and development settings and programs and incorporating them as part of the licensing requirements for family child care home providers. The application does include evidence that the Early Learning and Development Standards are incorporated in Program Standards and professional development activities. It is not clear from the information as to how they are linked to curricula and activities. The application addresses that there will be a plan to incorporate them into the Comprehensive Assessment Systems, the State's Workforce Knowledge and Competency Framework once those two areas are developed. (d) PR did not include specific information regarding supports that are in place to promote understanding of and commitment to the Early Learning and Development Standards across the early learning programs. The did describe an effort to support family day care setting through Project TAP: Developing Learning Environment that uses a mentoring model on how to align daily activities to the guidelines. PR needs to develop a plan with goals, activities, milestones and the appropriate financial resources to ensure that the activities will be accomplished. The plan needs to address a professional development and the creation of other resources that will be developed to create a shared understanding of the standards across programs.

	Available	Score
<b>(C)(2) Supporting effective uses of Comprehensive Assessment Systems.</b>	<b>15</b>	<b>0</b>
<p>The extent to which the State has a High-Quality Plan to support the effective implementation of developmentally appropriate Comprehensive Assessment Systems by--</p> <ul style="list-style-type: none"> <li>(a) Working with Early Learning and Development Programs to select assessment instruments and approaches that are appropriate for the target populations and purposes;</li> <li>(b) Working with Early Learning and Development Programs to strengthen Early Childhood Educators' understanding of the purposes and uses of each type of assessment included in the Comprehensive Assessment Systems;</li> <li>(c) Articulating an approach for aligning and integrating assessments and sharing assessment results, as appropriate, in order to avoid duplication of assessments and to coordinate services for Children with High Needs who are served by multiple Early Learning and Development Programs; and</li> <li>(d) Training Early Childhood Educators to appropriately administer assessments and interpret and use</li> </ul>		



assessment data in order to inform and improve instruction, programs, and services.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (C)(2)**

(a) PR's application states that they do not have a comprehensive assessment system island wide. The plan is to use RTT-ELC funds to develop a system that is aligned to the early learning standards, the programs standards and the Workforce Core Competencies and linked to child outcomes and school readiness. There is no information to indicate a plan for working with early learning programs in the selection process. In fact, the application indicates that the Ages and Stages Questionnaire is the screening instrument selected. (b) The application mentions that the QRIS system and the Early Childhood Core Knowledge and personnel enhancement plans will be strategies for strengthening early childhood educators' understanding of the purposes and uses of each type of assessment. No evidence or explanation is provided as to how that will be done. (c) More information is needed in the application to understand how PR plans on approaching the alignment and integration process. Currently, PR implements the Ages and Stages Questionnaire (ASQ) as their screening measure as a part of their assessment system. To ensure they are implementing a comprehensive assessment system they need to develop a plan for selecting and implementing formative assessments, measures of environmental quality and measures of the quality of adult and child interactions. The plan needs to address how early childhood programs will be included in the selection process; include a process of helping programs understand how to administer the various assessments and interpret the results in order to improve instruction in the classroom. A High Quality Plan for supporting effective uses of Comprehensive Assessment Systems is not included in this section. Key goals, activities with realistic timelines and key milestones and adequate financial resources are not included. The application does not provide clear and detailed information in response to each of the selection criteria.

	Available	Score
<b>(C)(3) Identifying and addressing the health, behavioral, and developmental needs of Children with High Needs to improve school readiness.</b>	<b>15</b>	<b>3</b>
<p>The extent to which the State has a High-Quality Plan to identify and address the health, behavioral, and developmental needs of Children with High Needs by--</p> <p>(a) Establishing a progression of standards for ensuring children's health and safety; ensuring that health and behavioral screening and follow-up occur; and promoting children's physical, social, and emotional development across the levels of its Program Standards;</p> <p>(b) Increasing the number of Early Childhood Educators who are trained and supported on an on-going basis in meeting the health standards;</p> <p>(c) Promoting healthy eating habits, improving nutrition, expanding physical activity; and</p> <p>(d) Leveraging existing resources to meet ambitious yet achievable annual targets to increase the number of Children with High Needs who--</p> <p>(1) Are screened using Screening Measures that align with the Medicaid Early Periodic Screening, Diagnostic and Treatment benefit (see section 1905(r)(5) of the Social Security Act) or the well-baby and well-child services available through the Children's Health Insurance Program (42 CFR 457.520), and that, as appropriate, are consistent with the Child Find provisions in IDEA (see sections 612(a)(3) and 635(a)(5) of IDEA);</p> <p>(2) Are referred for services based on the results of those screenings, and where appropriate, received follow-up; and</p> <p>(3) Participate in ongoing health care as part of a schedule of well-child care, including the number of children who are up to date in a schedule of well-child care.</p>		

Scoring Rubric Used: **Quality and Implementation**

**Comments on (C)(3)**

(a) In Section (B)(1) of the application there is a description of the Guidelines for Pediatric Preventive Services. The guidelines establish a series of screening, medical evaluations and interventions required for all children in the pediatric age range to facilitate the early detection and managements of conditions that can interfere with the child's growth and development. It is not clear from the information provided in the narrative and in from looking at the copy of the guidelines included in the appendix that they are standards. The focus of the guidelines is for peditriations. There is no evidence that PR has plans to develop a progression of standards for ensuring children's health and safety; ensuring that health and behavioral screening and follow-up occur; and promoting children's physical, social, and emotional development across the levels of its Program Standards. (b) Performance measures for increasing the number of children with high needs screened, referred for services and treated, and participating in ongoing health care are included in Table (C)(3)(d). The targets seem to be ambitious but it is not clear as to how existing resources will be leveraged to ensure the targets are achieved. (c) Information is not provided in the application for how PR is or plans on promoting healthy eating habits, improving nutrition, expanding physical activity. (d) Information is not provided in the appliation to explain how PR is leveraging existing resources to meet ambitious yet achievable annual targets to increase the number of Children with High Needs who are screened with measures that align with the Medicaid Early Periodic Screening, Diagnostic and Treatment benefit or the well-baby and well-child services available through the Children's Health Insurance

Program, and that, as appropriate, are consistent with the Child Find provisions in IDEA. Based on Table (C)(3)(d) there is concern that the number of children who are referred for services based on the results of screenings, and received follow-up is only 3.5%. That number seems low considering that high rate of poverty described in Section (A) and the knowing 33,028 children were screened. Based on the information provided in the narrative, none of the selection criteria are implemented and information as to plans for developing standards and training is not plan. The High Quality Plan for identifying and addressing the health, behavioral, and developmental needs of children needs to include goals, activities, milestones and adequate resources for developing the health standards and approaches for training early childhood educators in meeting the standards.

	Available	Score
<b>(C)(4) Engaging and supporting families.</b>	15	5

The extent to which the State has a High-Quality Plan to provide culturally and linguistically appropriate information and support to families of Children with High Needs in order to promote school readiness for their children by--

- (a) Establishing a progression of culturally and linguistically appropriate standards for family engagement across the levels of its Program Standards, including activities that enhance the capacity of families to support their children's education and development;
- (b) Increasing the number and percentage of Early Childhood Educators trained and supported on an on-going basis to implement the family engagement strategies included in the Program Standards; and
- (c) Promoting family support and engagement statewide, including by leveraging other existing resources such as through home visiting programs, other family-serving agencies, and through outreach to family, friend, and neighbor caregivers.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (C)(4)**

(a) This selection criterion is not currently implemented. The application states that PR does not currently have culturally and linguistically appropriate family engagement standards. PR will develop, as part of the State Plan, family engagement standards, in order to ensure that children and families' needs are addressed, and that children are well prepared for school. The standards will be developed by a multidisciplinary team composed by representatives of the Departments of the Family, Education, Health and CCDF providers, Head Start/Early Head Start grantees, non-profit organizations serving children 0-5. Once the standards are approved by both the PR House of Representatives and the Senate, the Department of the Family in coordination with PRSAC will be responsible for disseminating family engagement standards by media, web page updates, billboards, and training professionals, community leaders, and governmental agencies' staff. (b) The application does not address a strategy for increasing the number and percentage of early childhood educators trained and supported on an ongoing basis to implement the family engagement strategies included in the Program Standards. (c) The application describes a number of current programs and initiatives in place addressing family engagement. Appendix –Attachment 51 provides a detailed description of each initiative. The application addresses the expansion of 4 additional Early Childhood Resource and Referral Centers (CENTRANAs) to be located in the counties with families with the highest needs according to statistics provided by the Office for the General Coordinator for Socioeconomic Financing and Self Management (OFSA). Evidence of the ongoing commitment and leveraging of existing resources is documented in Budget Table I-3 and in each of the participating state agency budget tables. A High Quality Plan for engaging and supporting families does not include key goals, activities with realistic timelines and key milestones and how PR will address the needs to the different types of programs and impact the strategies will have on improving outcomes for children with high needs.

**D. A Great Early Childhood Education Workforce**

*The total points that a State may earn for selection criteria (D)(1) and (D)(2) is 40. The 40 points will be divided by the number of selection criteria that the applicant chooses to address so that each selection criterion is worth the same number of points. For example, if the applicant chooses to address both selection criteria under this Focused Investment Area, each criterion will be worth up to 20 points. If the applicant chooses to address one selection criterion, the criterion will be worth up to 40 points.*

*The applicant must address at least one of the selection criteria within Focused Investment Area (D), which are as follows:*

	Available	Score
<b>(D)(1) Developing a Workforce Knowledge and Competency Framework and a progression of credentials.</b>	20	5

The extent to which the State has a High-Quality Plan to--

- (a) Develop a common, statewide Workforce Knowledge and Competency Framework designed to promote children's learning and development and improve child outcomes;
- (b) Develop a common, statewide progression of credentials and degrees aligned with the Workforce Knowledge and Competency Framework; and

(c) Engage postsecondary institutions and other professional development providers in aligning professional development opportunities with the State's Workforce Knowledge and Competency Framework.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (D)(1)**

(a) The application states that PR needs to develop a Workforce Knowledge and Competency Framework and a progression of credentials. RTT-ELC funds will be used to create an early childhood workforce development system. The University of Puerto Rico has 11 campuses and three of them offer early childhood and preschool teacher training. They offer a graduate certificate in developmental disabilities. Puerto Rico has several academic programs in early childhood education in private institutions from a bachelor to master degree. The application states the standards will incorporate the elements of the TQRIS framework: child development, positive relations and social and emotional development and wellness; health and safety environment, curriculum development, implementation and evaluation, family engagement, community relations, observations and assessment and ethics. This entire infrastructure in the higher education system assures that PR has the capacity to design, implement and evaluate a Workforce Knowledge and Competency Framework and a progressive credentialing system. (b) PR plans on developing a credentialing system with three levels –beginners, intermediate and advanced. The early childhood educator level will depend on certified professional knowledge and experience in early childhood. The credentialing system will provide the ladder for pre-service and in-service trainees to develop knowledge and skills that foster early learning. The system will offer credentials for teachers, child care providers, visiting nurses, social workers and others offering related services to support child outcomes for school success. (c) The Early Childhood Workforce Institute (ECWI), comprised of experts in the field, will be established by ACUDEN. The Institute will work in coordination with the PRSAC in the design, development and evaluation of the workforce system. ECWI will develop a definition of early childhood educator and a reference document with professional competencies for early childhood preparation by levels of observable criteria and technical skills. This workforce competencies and credentialing ladder will be done in collaboration with the participating state agencies, Head Start Collaboration Office, professional boards and universities. The system will be informed by the TQRIS program standards and the early learning content standards. The completion of this task in a timely manner may be a challenge since the framework and credentials are all being developed at the same time. A High Quality Plan developing workforce knowledge and competency framework and a progression of credentials is not included in this section. Some of the required elements of the plan are addressed in the narrative. Activities with realistic timelines and key milestones and adequate financial resources are not included. The selection criteria as described in the application are not currently implemented and minimal evidence is provided on how the universities and other professional development providers will align credentials and professional development opportunities to PR's Core Knowledge and Competency Framework.

	Available	Score
<b>(D)(2) Supporting Early Childhood Educators in Improving their knowledge, skills, and abilities.</b>	<b>20</b>	<b>5</b>

The extent to which the State has a High-Quality Plan to improve the effectiveness and retention of Early Childhood Educators who work with Children with High Needs, with the goal of improving child outcomes by--

(a) Providing and expanding access to effective professional development opportunities that are aligned with the State's Workforce Knowledge and Competency Framework;

(b) Implementing policies and incentives (e.g., scholarships, compensation and wage supplements, tiered reimbursement rates, other financial incentives, management opportunities) that promote professional improvement and career advancement along an articulated career pathway that is aligned with the Workforce Knowledge and Competency Framework, and that are designed to increase retention;

(c) Publicly reporting aggregated data on Early Childhood Educator development, advancement, and retention; and

(d) Setting ambitious yet achievable targets for--

(1) Increasing the number of postsecondary institutions and professional development providers with programs that are aligned to the Workforce Knowledge and Competency Framework and the number of Early Childhood Educators who receive credentials from postsecondary institutions and professional development providers that are aligned to the Workforce Knowledge and Competency Framework; and

(2) Increasing the number and percentage of Early Childhood Educators who are progressing to higher levels of credentials that align with the Workforce Knowledge and Competency Framework.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (D)(2)**

(a) The application does not address how professional development opportunities aligned with PR's Workforce Knowledge and Competency Framework will be made more accessible to more early childhood educators. (b) The application states that the Puerto Rico State Advisory Council (PRSAC) is establishing a scholarship program for service providers in order for them to acquire one of the following certificates or credentials: Child Development Associate (CDA), special education, early education and early intervention certification. The scholarship candidates will be evaluated by the professional workforce development subcommittee of the PRSAC and needs determined by the evidence presented in the program's TQRIS improvement plan. (c) PRSAC has begun the process of creating a data system to collect data related to supply and demand of services, cost, funding, and number of children served, workforce information and quality requirements. In addition, information about the number of early childhood educators enrolled in higher education, training programs, employed, vacancies and retention in the system will need to be included. (d) Table (D)(2)(d)(1) provides targets for increasing the number of early childhood educators receiving a credential from an institution with programs aligned to the Workforce Knowledge and Competency Framework. The goal is ambitious and achievable. Table (D)(2)(d)(2) does not provide a progression of higher levels of credentials, only the CDA is listed with targets. Little evidence is provided regarding adequate financial resources to determine if this goal is ambitious or achievable. A High Quality Plan for supporting early childhood educators in improving their knowledge, skills, and abilities is not included in this section. Key goals, activities with realistic timelines and key milestones and adequate financial resources are not included. Not all of the selection criteria are addressed and those that are are minimally implemented.

**E. Measuring Outcomes and Progress**

The total points an applicant may earn for selection criteria (E)(1) and (E)(2) is 40. The 40 points will be divided by the number of selection criteria that the applicant chooses to address so that each selection criterion is worth the same number of points. For example, if the applicant chooses to address both selection criteria under this Focused Investment Area, each criterion will be worth up to 20 points. If the applicant chooses to address one selection criterion, the criterion will be worth up to 40 points.

The applicant must address at least one of the selection criteria within Focused Investment Area (E), which are as follows:

	Available	Score
<b>(E)(1) Understanding the status of children's learning and development at kindergarten entry.</b>	20	5

The extent to which the State has a High-Quality Plan to implement, independently or as part of a cross-State consortium, a common, statewide Kindergarten Entry Assessment that informs instruction and services in the early elementary grades and that--

- (a) Is aligned with the State's Early Learning and Development Standards and covers all Essential Domains of School Readiness;
- (b) Is valid, reliable, and appropriate for the target population and for the purpose for which it will be used, including for English learners and children with disabilities;
- (c) Is administered beginning no later than the start of school year 2014-2015 to children entering a public school kindergarten; States may propose a phased implementation plan that forms the basis for broader statewide implementation;
- (d) Is reported to the Statewide Longitudinal Data System, and to the early learning data system, if it is separate from the Statewide Longitudinal Data System, as permitted under and consistent with the requirements of Federal, State, and local privacy laws; and
- (e) Is funded, in significant part, with Federal or State resources other than those available under this grant, (e.g., with funds available under section 6111 or 6112 of the ESEA).

Scoring Rubric Used: **Quality and Implementation**

**Comments on (E)(1)**

(a) The application states that PR has a kindergarten entry assessment, entitled the Teacher Observation Scale that is implemented in all school districts and is aligned to the early learning content standards. There is a discrepancy in the information provided in the application. The narrative states that the observation tool covers all of the essential domains of school readiness, but Table 1, in the application, only reports results on language and literacy; approaches toward learning; cognitive knowledge; and general math concepts. No mention is given to social and emotional development and physical health. (b) The application states that the validation of the tool, its appropriateness and reliability, is a result of a thorough discussion of experiences among peers, social workers, and parents. It is not clear from the response provided that a rigorous methodology was used to determine validity, reliability for measuring the areas described: social and emotional development; cognitive development; physical well-being and motor development and general knowledge. Table (A)(1)-12 documents that the observation scale does not provide evidence of validity for children with disabilities and English learners. (c) The tool currently used will continue to be implemented in 2014-2015. The application states that all school districts must administer the observation scale no later than the first two weeks of the school year. (d) Table (A)(1)-12 documents that the results of the observation scale are not reported in the longitudinal data system. The application states that a manual data gathering data process is currently used. The application states that strengthening the data systems to ensure that collection of all stakeholders involved in the kindergarten assessment entry process is collected, organized, and analyzed in a timely manner, will support state efforts to

design strategies to improve practices in early learning and development programs and inform instructional strategies in kindergarten. The application does not address how the enhancements will occur. (e) Since the tool has been developed and used for the past ten years no funds are being requested for development.

	Available	Score
<b>(E)(2) Building or enhancing an early learning data system to improve instruction, practices, services, and policies.</b>	<b>20</b>	<b>12</b>

The extent to which the State has a High-Quality Plan to enhance the State's existing Statewide Longitudinal Data System or to build or enhance a separate, coordinated, early learning data system that aligns and is interoperable with the Statewide Longitudinal Data System, and that either data system--

- (a) Has all of the Essential Data Elements;
- (b) Enables uniform data collection and easy entry of the Essential Data Elements by Participating State Agencies and Participating Programs;
- (c) Facilitates the exchange of data among Participating State Agencies by using standard data structures, data formats, and data definitions such as Common Education Data Standards to ensure interoperability among the various levels and types of data;
- (d) Generates information that is timely, relevant, accessible, and easy for Early Learning and Development Programs and Early Childhood Educators to use for continuous improvement and decision making; and
- (e) Meets the Data System Oversight Requirements and complies with the requirements of Federal, State, and local privacy laws.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (E)(2)**

(a) The application states that PR's plan is to build a data system. The plan is to initiate a process for identifying the information requirements, sources of information, users, roles, responsibilities, accessibility and data requirements, at a minimum. The plan will be developed in parallel with the initial phase of the statewide longitudinal data system, where the governance structure will establish a set of rules that will serve and the primary guide for this effort. The application documents that attention will be given to ensure all of the essential data elements will be included. The application states that data structures, linkages, relationships, definitions and many other qualifiers, such as information users who define elements required for capturing, reporting and controlling the process are critical. The essential data elements will correspond with the definitions and uses of the Statewide Longitudinal Data System (SLDS). Table (A)(1)-13 documents the profile of the current data systems being used in PR. (b) The application states that proper identification of the early childhood system data collection points, the type of data collected, method of collecting the data and the needed collaborations of the entities involved will be completed and shared with the SLDS project development group. (c) The application states that the PR Department of Education currently has a Student Information System (SIS) that collects information on students enrolled in the public system. A convergence with that system will be the starting point for determining data exchange. The application states that data exchange standards, such as the National Information Exchange Model, and other standards deemed appropriate by the Office of National Coordination of electronic health information, will be used to inform this phase of the project. (d) The application states that the SLDS will extend from early childhood through the integration of workforce. The early childhood portion will be a subset of the larger project to ensure all aspects of the project pertinent to early childhood system are not lost in the larger context. Information regarding other state data systems will be used to inform the work of the early childhood data project. The focus stated in the application is to build a system that has automatic, online, real time or a synchronous data exchange to ensure that correct, timely and relevant information elements are available for producing intelligence well founded on complete data. In addition, business analytics tools will be employed to facilitate the delivery of standardized and easy to manipulate and understand analyses for public consumption. (e) The application states that, due to the potential nature of collecting, recording and managing sensitive data, the initial phase of the project will identify all laws, regulations, pronouncements and enactments that may deal with the data being collected and shared among entities. The High Quality Plan for building or enhancing an early learning data system to improve instruction, practices, services and policies includes all of the required components and addresses the selection criteria with approaches to planning and design that are feasible and have a high probability of successful implementation.

	Available	Score
<b>Total Points Available for Selection Criteria</b>	<b>280</b>	<b>89</b>

**Priorities**

Competitive Preference Priorities

	Available	Score
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**Competitive Preference Priority 2: Including all Early Learning and Development Programs in the Tiered Quality Rating and Improvement System**

10

6

Competitive Preference Priority 2 is designed to increase the number of children from birth to kindergarten entry who are participating in programs that are governed by the State's licensing system and quality standards, with the goal that all licensed or State-regulated programs will participate. The State will receive points for this priority based on the extent to which the State has in place, or has a High-Quality Plan to implement no later than June 30, 2015--

(a) A licensing and inspection system that covers all programs that are not otherwise regulated by the State and that regularly care for two or more unrelated children for a fee in a provider setting; provided that if the State exempts programs for reasons other than the number of children cared for, the State may exclude those entities and reviewers will score this priority only on the basis of non-excluded entities; and

(b) A Tiered Quality Rating and Improvement System in which all licensed or State-regulated Early Learning and Development Programs participate.

Scoring Rubric Used: **Quality and Implementation**

**Comments on (P)(2)**

(a)The application clearly states that the current process licenses all establishments that provide early learning and development services to children less than five years of age. The regulations state that an establishment that provides services to 2-6 children is considered a family day care and one over 6 is a center. The application does not include information of Family Friend and Neighbor Care so it is not clear that all types of early learning and development programs are included in the licensing and monitoring system. Currently, Early Head Start and Head Start are exempt from state licensing but as stated in (B)(2) they will be required to be licensed by 2014-2015. It is stated in the application that as part of the reform agenda a goal is to restructure the licensing process, organizational structures and the regulations. The PRSAC has already initiated the process for analyzing and revising the licensing regulations. A subcommittee, with representatives of the different early learning and development programs, is in the process of analyzing the actual regulations and requirements. The analysis is being conducted to ensure alignment with the QRIS instrument, the Early Learning Standards and the Guidelines for Health Preventive Services. The PRSAC has been conducting a series of focus groups with EHS, HS, CCDF funding providers and Pre-K providers to discuss requirements, coordination with other agencies providing services, staff qualifications and monitoring quality. Recommendations from these discussions will be incorporated into the licensing restructuring. (b) The application states that all centers that are licensed will be in compliance with the first tier of the TQRIS (Pasitos)system. Centers will be required to conduct an evaluation of using the quality instrument and develop an improvement plan. The PRSAC will promote the system and will initiate an educational process to guarantee that providers understand the importance of the system. Provider incentives are proposed. ACUDEN will be responsible for expanding the existing QRIS project and for providing incentives. The first two years of the QRIS system will be voluntary until the licensing restructuring is completed and legislation is passes. Once the center QRIS instrument is validated, a family day care instrument will be created. Until that time, mentoring and technical assistance and assisting family day care homes with using the Family Rating Scale and developing improvement plans based on the results. No information is provided in the plan to ensure full implementation no later than June 30, 2015. A High Quality Plan for including all early learning and development programs in the TQRIS is not included in this section. Some of the required elements of the plan are addressed in the narrative. Key goals, with realistic timelines and key milestones and adequate financial resources are not included. The narrative does provide evidence that each element of the priority is implemented or is planned.

Priorities

	Available	Yes/No
<b>Competitive Preference Priority 3: Understanding the Status of Children's Learning and Development at Kindergarten Entry</b>	<b>0 or 10</b>	<b>No</b>
To meet this priority, the State must, in its application--		
(a) Demonstrate that it has already implemented a Kindergarten Entry Assessment that meets selection criterion (E)(1) by indicating that all elements in Status Table (A)(1)-12 are met; or		
(b) Address selection criterion (E)(1) and earn a score of at least 70 percent of the maximum points available for that criterion.		
<b>Comments on (P)(3)</b>		
(a) Evidence in Table (A)(1)-12 documents that the current kindergarten entry assessment is not valid for children with disabilities, English learners and the results are not included in the statewide longitudinal data system.		

Absolute Priority

	Met? Yes/No
<b>Absolute Priority - Promoting School Readiness for Children with High Needs.</b>	<b>No</b>

To meet this priority, the State's application must comprehensively and coherently address how the State will build a system that increases the quality of Early Learning and Development Programs for Children with High Needs so that they enter kindergarten ready to succeed.

The State's application must demonstrate how it will improve the quality of Early Learning and Development Programs by integrating and aligning resources and policies across Participating State Agencies and by designing and implementing a common, statewide Tiered Quality Rating and Improvement System. In addition, to achieve the necessary reforms, the State must make strategic improvements in those specific reform areas that will most significantly improve program quality and outcomes for Children with High Needs. Therefore, the State must address those criteria from within each of the Focused Investment Areas (sections (C) Promoting Early Learning and Development Outcomes for Children, (D) A Great Early Childhood Education Workforce, and (E) Measuring Outcomes and Progress) that it believes will best prepare its Children with High Needs for kindergarten success.

**Comments on Absolute Priority**

The application and evidence provided do not coherently and comprehensively address how the Puerto Rico will build a system that will increase the quality of early learning and development. The information was often incomplete or not well organized to clearly inform the reader as to how the work would lead to building an early childhood system. A significant number of activities and initiatives were described and funded in the budget tables but it is not clear as to the relationship in building a system. A number of the expenditures raised questions as to relationship of the project to improving outcomes for young children. A State Plan was mentioned but not included to document key goals, activities, timelines and milestones. The idea of a reform agenda was stated but no explicit activities described. The reader had to assume what would be included in a reform agenda based on a review of the Tables in Section (A). It was difficult to determine how existing resources and RTT-ELC funds would be leveraged or how the work would be sustained after the grant funding period. There was discussion of developing a progression of credentials but information only gave a baseline for one level, the Child Development Associate. The application stated that university would be involved in the process, but a clear description as to a process included in a high-quality plan was not provided. The application states that the TORIS system, Little Steps, is in the pilot phase but insufficient documentation was provided regarding the validity and the reliability of the monitoring process, the instruments, and for determining the different tiers of quality relate to improved child outcomes. Much of the narrative repeated the selection criteria without evidence and documentation to know what was currently implemented or planned.