

U.S. Department of Education
Puerto Rico Education Sustainability (PRES) Team

Proposed Technical Assistance Plans for Puerto Rico Department of Education (PRDE)



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I. Background

On September 15, 2021, the U.S. Department of Education (Department) announced the formation of the Puerto Rico Education Sustainability (PRES) Team. The PRES Team is represented by staff from offices across the Department with subject matter expertise, and many of them with bilingual skills, to enhance and provide comprehensive support to Puerto Rico (PR) and the Puerto Rico Department of Education (PRDE).

In support of this effort, the PRES Team began collaborating with PR and PRDE and identified three key priority areas:

1. Financial responsibility, with the goal of PRDE regaining financial management authority of their federal funds;
2. Program support, continuing to support PRDE in their use of American Rescue Plan (ARP) and other federal pandemic recovery funds, along with bolstered technical assistance for high-quality instruction and improved implementation of major formula grant programs; and
3. Safe and healthy school buildings, working with partners to provide technical assistance as the PRDE continues school infrastructure improvements.

In October of 2021, the PRES Team conducted over 12 listening sessions with representatives from the Office of the Governor of Puerto Rico and PRDE's Office of Federal Affairs and Office of Academic Affairs. The purpose of these listening sessions was for the PRES Team to learn from PR and PRDE their needs and challenges in the administration, management and implementation of federal education funds and programs. Consistent with Department efforts to meet the grantees where they are, with a lens of cultural awareness and sensitivity, these sessions included expert support from bilingual staff and the use of simultaneous interpretation services.

Following up on these listening sessions, in November of 2021, the PRES Team conducted a two-week site visit to Puerto Rico. While on-site, the PRES Team provided immediate technical assistance (TA) on the most urgent matters regarding the Coronavirus Aid, Relief, and Economic Security Act (CARES Act); Coronavirus Response and Relief Supplemental Appropriations Act, 2021 (CRRSA Act); and the American Rescue Plan (ARP). In addition, the PRES Team carried out a comprehensive assessment of fiscal and programmatic areas.

Based on the comprehensive assessment, the Department developed these proposed TA assistance plans that will serve to support and guide the development of training sessions and assistance from the Department in partnership with PR and PRDE.

II. Fiscal - Office of Finance and Operations (OFO)

a. Acquisition and Procurement

Presenters:

- Jacob Acosta, *Group Manager, Contracts & Acquisitions Management / PRES Member*
- Carlina Smith, *Contracting Officer, Contracts & Acquisitions Management / PRES Member*
- Juan Bibiloni-Rivera, *Education Program Specialist /PRES Member*
- Lorena Dickerson, *Senior Risk Specialist, Grants Risk Management Services Division (GRMSD) / PRES Co-coordinator*

Goal:

Our goal for this Technical Assistance (TA) Plan is to provide a two-phase approach for short-term and long-term technical assistance to PRDE procurement professionals to foster better communication and provide operational policy and operational guidance.

- Strengthening governance structures to reduce program monitoring findings in areas of procurement
- Identifying skills, and capabilities needed in PRDE procurement operations
- Improving productivity and efficiency for program implementation
- Developing a culture of training and professional development

Phase 1:

Method of Short-Term Technical Assistance

In-person and virtual assistance will be provided to PRDE procurement professionals. A combination of direct training and observation will be provided by senior contracting officers from the Office of Finance and Operations (OFO). Presentation materials and procurement document templates will be provided for each training session. The intent of each training session is to be successive in nature based upon observations during the previous session.

- Senior Contracting Officers will provide on-site “brown bag” training sessions with several key PRDE stakeholders with various levels of formality depending on audience. Each session will build upon the previous session as OFO continues to identify areas for targeted assistance.
 - PRDE Procurement Area Sessions:
 - Purchasing Office/Impact of Relocation of PRDE Offices to Puerto Rico General Service Administration (PR-GSA)
 - Discussion of procurement sections 2 CFR §§ 200.318-200.327 as required in the Departmental specific conditions
 - Discussion of policy internal to PRDE impacted by PR-GSA
 - Discussion of PRDE procedures from requisition to award and post-award monitoring
 - Training of staff (e.g., conflict of interest & ethics)
 - Long Term procurement strategies
 - Operational Stakeholder Sessions:
 - Procurement governance structure best practices
 - Provide samples of industry standard documentation such as Statements of Work, Statements of Objectives, Performance Work Statements

- Information Sharing: walk-thru of a federal procurement
- Methods of Deliverable Acceptance and Inspection
- Topics defined by PRDE, areas of concern or improvement

Method of Long-Term Technical Assistance

- External Training: OFO recommends that PRDE develop and implement a formal training program that will provide them with the opportunity for formal procurement training. OFO has conducted market research to identify providers that develop procurement and ethics training specific to grantees. These sources can conduct virtual and onsite training with the ability to lecture in Spanish and English. Costs would be paid directly by PRDE. OFO will assist in the development and coordination as needed.

Proposed In-Person meetings with PRDE

	<i>Dates</i>
<i>Session-1</i>	❖ June 13-17, 2022
<i>Session-2</i>	❖ August 8-12, 2022
<i>Session-3</i>	❖ September 5-9, 2022

Monitoring and follow-up's

Virtual meetings will take place as-needed outside of the dates specified above.

Phase 2:

- PRDE’s third-party fiduciary agent Alvarez & Marsal (A&M) completion of recommendations in the area of procurement: This session of training is scheduled as Phase 2 since the recommendations by A&M will not be finalized until the 1st quarter of FY 2023. OFO will review and determine further training as necessary to support PRDE with the implementation of the comprehensive corrective action plan (CCAP) as required under the Departmental specific conditions.

b. Accounting and Finance

Presenters:

- Christian A. Muniz, *Cost Negotiator, Indirect Cost Division/ PRES Member*
- Juan Bibiloni-Rivera, *Education Program Specialist /PRES Member*
- Richard Reiber, *Accountant, Grants Risk Management Services Division*
- Lorena Dickerson, *Senior Risk Specialist, Grants Risk Management Services Division/ PRES Co-Coordinator Member*

Goal:

Our goal for this TA Plan is to provide PRDE staff with a deeper understanding of critical areas of general accounting and finance requirements for proper administration and management of federal education funds. The TA aims to assist PRDE in complying with the Departmental specific conditions, reduce audit findings and be positioned to gain financial control of its federal education funds. Training will cover areas such as:

- Indirect Cost:
 - a. develop an indirect cost rate proposal
 - b. properly classify costs as indirect, direct, or excluded costs
 - c. interpret and apply the negotiated indirect cost rate
 - d. apply the Uniform Guidance (2 CFR Part 200) and Education Department General Administrative Regulations (EDGAR)
- Internal Controls Over Payroll
 - a. standards for documentation of personnel expenses
 - b. personnel charges to federal awards
 - c. time and attendance reporting
 - d. policies and procedures
 - e. apply 2 CFR Part 200, Subpart E, and more specifically, 2 CFR §§ 200.430 and 200.431 as required by the Departmental specific conditions.

Indirect Cost Rate:

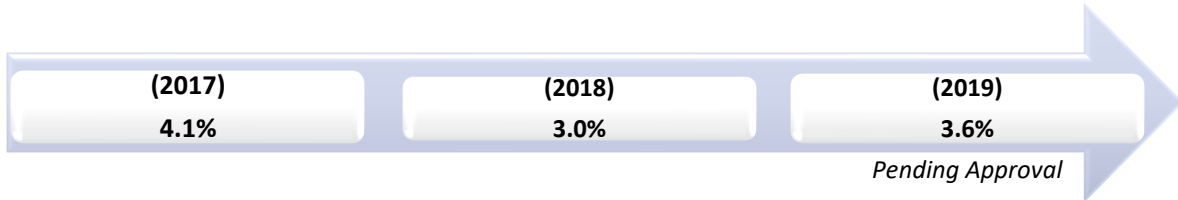
PRDE has been using consultants (i.e., BDO, and other CPA firms) to develop the indirect cost rate proposals for many years. It is ED's responsibility, as the cognizant agency for indirect costs, to provide the technical assistance to ensure our partners understand the development of the indirect cost proposal, and the application of federal regulations for cost allocation. PRDE is delinquent in submitting their indirect cost rate proposals due to the late submission of single audits. (See Chart below).

Methods of Technical Assistant for Indirect Cost Training

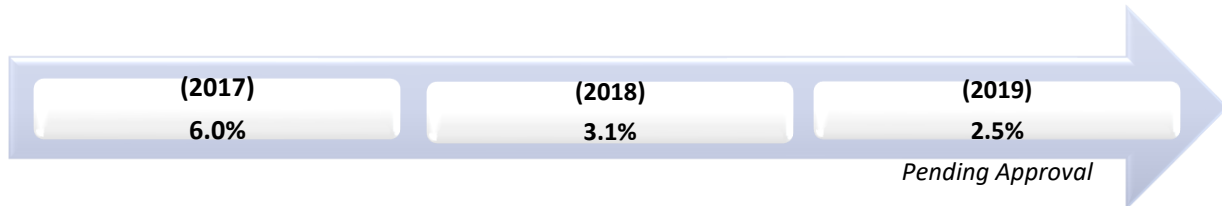
The methods that will be used to provide technical assistance to PRDE will be in person and/or virtual. We will provide a PowerPoint presentation; we will walk-through the indirect cost rate proposal; and we will use the Cost Allocation Guide to provide hands-on training on the development of the indirect cost rate proposal.

Historical Indirect Cost Rates

Restricted Rates - Regular School Program



School Lunch Rates



PRDE's Historical Indirect Cost Rate Submissions

Normally, State Education Agencies submit their indirect cost proposal within six months after the close of the fiscal year. For fiscal years Ending June 30th, they must submit their Indirect cost proposal by December 31st of the same year.

Historically, PRDE has submitted the indirect cost rate proposals one or two years late due to the delayed approval or submission of the Single Audit. Currently, PRDE is operating with provisional rates for fiscal years 2019, 2020, and 2021. For PRDE to be current, we must finalize the provisional rates.

Indirect Cost Follow-up

OFO will work with PRDE on the development of the indirect cost rate proposal, proposed accounting changes, planned organizational changes, or significant changes that may impact the indirect cost rates.

Internal Control Over Payroll:

PRDE has not established and maintained an effective and accurate process for tracking and reporting time and effort spent by all employees whose salaries are paid with federal education funds. TA in this area will be established as a two-phase approach for short-term and long-term execution. Training will provide PRDE with tools to develop adequate internal controls over its payroll process.

- Increase knowledge of federal requirements/practical applications
- Understand risk factors that have the potential for abuse and misuse of federal education funds
- Establish a culture for communication and coordination among PRDE Offices that play a role in the payroll process

Phase 1:Method of Short-Term Technical Assistance

In-person assistance will be provided to staff from PRDE's Budget Office, Human Resources Office, Payroll Office, and Finance Department. Understanding the complexity in PRDE's payroll system, a combination of direct and observation methods will be used. These methods will assist trainers identify/address with PRDE staff specific issues that have resulted in material weakness findings in audit reports issued to PRDE. Presentation materials, sample documents and other resources will be used during training. To properly support PRDE in building a strong system of internal controls that provides reasonable assurance that charges to federal education funds are accurate, allowable and properly allocated, trainers will study and review with PRDE, the Time and Attendance project required by FOMB developed to identify deficiencies in payroll.

The intent of each training session is to be successive in nature based upon observations during the previous session.

- Accounting, Finance and Risk Specialist experts will provide training to PRDE Area personnel involved in the payroll process. Sessions will include formal training and "brown bag" technique. These training methods will help increase communication and coordination among PRDE areas responsible for the payroll cycle. Each session will build upon the previous session as OFO continues to identify areas for targeted assistance.
 - Internal Controls Over Payroll Sessions:
 - Discussion of Time and Effort and Key Requirements--2 CFR Part 200, Subpart E, and more specifically, 2 CFR §§ 200.430 and 200.431 as required in the Departmental specific conditions
 - Discussion of PRDE payroll system, including the role of the Puerto Rico Treasury Department
 - Review and discussion of payroll audit findings cause and effect
 - Time and Attendance Project Implementation
 - Review and discussion of organizational chart of responsible PRDE Areas/personnel and existing process flows
 - Operational Sessions:
 - Time and Effort tracking and reporting system best practices
 - Provide samples of methodologies and tools for tracking, documenting, and reporting Time and Effort
 - Accountability—tools to increase effective communication and coordination among PRDE responsible areas
 - Topics defined by PRDE, areas of concern or improvement

Phase 2:Method of Long-Term Technical Assistance

- PRDE's third-party fiduciary agent Alvarez and Marsal (A&M) recommendations in the area of time distribution and payroll as a result of their assessment. This session of training is scheduled as Phase 2 since the recommendations by A&M will not be finalized until the 1st quarter of FY 2023. OFO will review and determine further training as necessary to support PRDE.

Application- In Person meetings with PRDE

	<i>Dates</i>
<i>Session-1</i>	❖ June 13-17, 2022
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c. Uniform Guidance

Presenters:

- David J. Downey, *Grants Management Policy Division (GMPD) Presenter*
- Blanca Rodriguez, *Grants Management Policy Division (GMPD) Presenter*
- Pedro Romero, *Grants Management Policy Division (GMPD) Presenter*
- Lorena Dickerson, *Senior Risk Specialist, Grants Risk Management Services Division /PRES Co-coordinator*
- Juan Bibiloni-Rivera, *Education Program Specialist /PRES Member*

Goal:

Our goal for this Technical Assistance (TA) Plan is to provide a multi-day training course virtually with an in-person element to provide on-site support. Training will enhance and increase PRDE's staff understanding of federal education requirements with the goal of reducing program and audit findings. At the conclusion of this training participants will be able to:

- *Compare and contrast grant administration tools of the trade (requirements in 2 CFR Parts 25, 170, 183, and 200; EDGAR; program statutes; Grant Award Notification (GAN))*
- *Navigate applicable Federal requirements in 2 CFR Parts 25, 170, 183, and 200*
- *Describe ED and Federal-wide financial and grant administration policies*
- *Identify generally allowable and unallowable expenditures*
- *Assess organizational risks impacting grant project success*
- *Select proportional and responsive mitigation strategies to reduce risk impacts*
- *Access additional grant administration training tutorials for further professional development via ED.gov*

Day 1Method of Instruction for Technical Assistance

Virtual training with an in-person element will be utilized in the training of PRDE staff. The 90-minute to two-hour overview training will combine lecture, small group or individual exercises, and a Q&A segment. Presentation materials will be provided for each training session translated into Spanish providing hard copy job aids as well as links to access materials electronically. This session sets the stage to allow participants to apply what they learn and the resources they have been exposed to in practical, realistic scenarios using case study examples during subsequent sessions.

- Intro—outlining the partnership between ED and Puerto Rico to ensure their programmatic success and compliance with all requirements in administering their ED grants
- Breakdown of responsibilities comparing and contrasting how we work together
- Identifying tools of the trade
 - Program statute and regulations
 - Education Department General Administrative Regulations (EDGAR) (including 34 CFR Parts 75 and 76)
 - Applicable governmentwide regulations
 - Highlighting layout and key parts (i.e., 2 CFR Parts 25, 170, 183, 200)
 - ED program policies and procedures (woven through the review of 2 CFR Part 200)
 - GAN
 - Award terms and conditions
 - G5
- 2 CFR Part 200 Uniform Guidance
 - Review its table of contents
 - Subpart A-Definitions & Acronyms
 - Subpart B-General Provisions
 - Subpart C-Pre-Award
 - Subpart D-Post Award
 - Subpart E-Cost Principles
 - Subpart F-Audits
 - Appendices
 - Overview of each subpart, allowing participants to navigate the ecf.gov to locate citations, identify generally allowable costs, and practice searching for information
 - Q&A

Day 2

Method of Instruction

Virtual training with an in-person element will be utilized in the training of PRDE staff. The 90-minute to two-hour session moves from lecture to an emphasis on small group or individual exercises, and a Q&A segment. Presentation materials will be provided for each training session translated into Spanish providing hard copy job aids as well as links to access materials electronically. Case studies are being developed based on ED program staff records, identified risk concerns, and realistic challenges that grantees face when administering ED grant projects.

- Emphasize Subparts C (risk evaluation), D (internal controls) and E (cost principles).

Day 3

Methods of Instruction

- Case studies and classroom conversations continue with an emphasis on using 2 CFR Part 200 to improve grantee oversight. This 90-minute to two-hour class will generate conversation in selecting the most effective communication and risk mitigation strategies to improve performance and compliance.

	<i>Fechas</i>	<i>Duración</i>
<i>Sesión-1</i>	❖ August 2022	<i>4 hours Morning & Afternoon Sessions: PRDE Office of Federal Affairs and Office of Special Education</i>
<i>Sesión-2</i>	❖ September 2022	<i>2 hours PRDE Central Level Staff</i>

III. Programmatic

a. Office of Elementary and Secondary Education (OESE)

TA Need	Issue	Recommended Solution	Expected Outcome	Method of Delivery	Timeline
<p>1) In depth understanding of uses of funds for allowable activities and statutory requirements</p>	<p>PRDE indicated that staff from the Office of Federal Affairs (OFA) and the Office of Academic Affairs (OAA) have varied understanding of program requirements and allowable uses of funds for OESE programs.</p> <p>Next Steps for PRDE:</p> <p>Identify PRDE lead for this goal.</p> <p>Identify PRDE staff for each of the OESE programs.</p>	<p>Phase 1:</p> <ul style="list-style-type: none"> • With PRDE’s approval, ensure that PRDE’s OFA website contains accurate information on OESE programs in Spanish and English. • Identify an OESE rep for each program to be paired with PRDE staff to 1) update the information on the website and 2) work together to prepare the program training. • OESE program representatives, Office of Non-Public and Private Education (ONPE) ombudsman program rep (as appropriate) and PRDE staff co-facilitate a training session with (using Ivonne’s model) both OAA and OFA (individually or grouped) for the following programs (final list to be determined based on capacity) <ul style="list-style-type: none"> ○ Title I-A 	<p>Once this solution is implemented OESE would expect that the number of programmatic questions from PRDE would be reduced and PRDE would be able to train new staff on the requirements and allowable activities. Additionally, ONPE would expect that inquiries and complaints from private school stakeholders would decrease.</p>	<p>Virtual or On-site, as possible</p>	<p>6 months</p>

TA Need	Issue	Recommended Solution	Expected Outcome	Method of Delivery	Timeline
		<ul style="list-style-type: none"> ○ Title II-A ○ Title III-A ○ Title IV-A ○ Title IV-B-21st CCLC ○ Homeless ○ Restart ○ Neglected/Delinquent ○ ESSER (I, II, ARP ESSER) ○ EANS ● After completion of the website and initial trainings for each program, Region 3 Comprehensive Center (R3CC) and the PRDE Institute of Professional Development can feature these program trainings in their Professional Development catalog. These program trainings would be provided by PRDE staff moving forward. ● Identify key OESE documents that relate to the training sessions to translate. ● Translate key OESE documents into Spanish to increase utilization and understanding amongst PRDE staff of program requirements (items include but are not limited to FAQs, 			

TA Need	Issue	Recommended Solution	Expected Outcome	Method of Delivery	Timeline
		<p>white-papers, webinar decks, etc.)</p> <ul style="list-style-type: none"> • ONPE program staff to provide technical assistance on the development of an equitable services consultation plan. • ONPE will share best practices to consult with non-public schools and how PRDE could collaborate with ED for review and feedback. • ONPE will share best practices for PRDE to engage with private school leaders and ED staff (OESE and ONPE) to receive input from impacted stakeholders on the effectiveness of interventions. • ONPE staff will discuss ESEA equitable services policies, procedures and processes. In addition, ONPE will work with PRDE on strategies to institutionalize ESEA equitable services requirements. 			

TA Need	Issue	Recommended Solution	Expected Outcome	Method of Delivery	Timeline
<p>2) Assist PRDE in American Rescue Plan Elementary and Secondary School Emergency Relief Fund (ARP ESSER) State Plan implementation</p>	<p>PRDE was awarded \$2,965,938,760 in ARP ESSER funds to implement their State Plan (approved 11.2021) and needs assistance in implementing initiatives within their plan.</p> <p>Next Steps for PRDE:</p> <p>Identify PRDE lead(s) for this goal. The lead(s) will work with the Department to coordinate activities and better define the training need.</p>	<ul style="list-style-type: none"> • With PRDE’s approval, utilize the Health and Social Services Recovery Support Function (HSS RSF) to assist with implementation of key aspects of PRDE’s ARP ESSER State plan including: <ul style="list-style-type: none"> ○ Training of parents on use of technology purchased through ARP ESSER ○ Brokering connections (such as from the Dept of Health) to assist in the hiring of mental health professionals ○ Training on use of community health centers and an integrated service model¹ • Assist PRDE in creating a map of ESSER funds and projects that are aligned to PRDE’s strategic plan goals along with a flow chart to guide PRDE’s thinking when deciding upon new initiatives to add. 	<p>PRDE will be able to implement certain initiatives within its ARP ESSER State Plan faster and cheaper utilizing HSS RSF’s connections and existing resources.</p>	<p>In-person</p>	<p>6-12 months (HSS RSF 3rd year ends 3.2023)</p>

¹ The Integrated Services Model (MSI) is a planning tool to facilitate the effective and efficient process of identifying needs and solutions to implement a community-integrated services model that addresses the following five (5) basic areas: physical health, behavioral health, nutrition, and food safety, environmental health and safety, and intellectual and cultural enrichment. This workshop aims to train future implementers on the process of establishing the MSI in various community spaces, including schools, preschools, communities of older adults, or groups focused on the interests of populations with access and functional needs, among others.

TA Need	Issue	Recommended Solution	Expected Outcome	Method of Delivery	Timeline
<p>3) Support PRDE staff to better understand the evidence-based requirements in ESEA and the four levels of evidence</p>	<p>In several listening sessions, PRDE staff indicated that they would like to better understand the evidence-based requirements in ESEA so that they can adopt the best strategies for their students.</p> <p>Next Steps for PRDE:</p> <p>Identify PRDE lead(s) for this goal. The lead(s) will work with the Department to coordinate activities and better define the training need.</p>	<ul style="list-style-type: none"> • Based on input from PRDE staff and using existing Federally developed resources² as a starting point, develop a two-hour training session on the evidence-based requirements in ESEA. The in-depth training will provide the necessary background knowledge for PRDE staff to understand the statutory requirements including the four different levels of evidence outlined in the statute. Additionally, the training will focus on the application of knowledge through hands-on training activities. • Identify key documents that relate to the training session to translate. • Translate documents into Spanish to increase utilization and understanding amongst PRDE staff of evidence-based requirements in ESEA. 	<p>After meeting this need, OESE would expect that PRDE would have a better understanding of the four levels of evidence and how to utilize the four levels of evidence to identify strategies to improve student outcomes with less assistance from the Department.</p>	<p>Virtual or On-site, as possible</p> <p>Title IV-A (T4PA) Technical Assistance Center will develop, along with OSSS staff, the training session and deliver the training to PRDE staff.</p>	<p>6-12 months</p>

• ² The training will be based on the foundations established in the presentation developed by IES titled *Using and Building Evidence for Recovery and Reopening: A Brief Guide for States, Districts, and Institutions of Higher Education* as well as other Federally developed resources.

TA Need	Issue	Recommended Solution	Expected Outcome	Method of Delivery	Timeline
		<ul style="list-style-type: none"> • Include PRDE in The National Comprehensive Center's Communities of Practice: Evidence-Based Interventions: Using ARP Resources to The National Center. Assist PRDE in creating a cross-departmental team to participate in the CoP with 3-5 members to include any of the following members: ESSER Leadership, Finance, Federal Programs, Curriculum and Instruction, School Transformation. 	<p>Using ARP Resources to Accelerate Learning Community of Practice (EBI Community), PR will engage with other state teams in shared inquiry to identify and collectively address problems of practice related to ensuring effective and sustainable use of ARP funding to support learning recovery/learning acceleration. Through the use of improvement science and peer exchanges, the PR team will deepen their capacity to support OREs in the use of evidence-based interventions to accelerate learning.</p>		

TA Need	Issue	Recommended Solution	Expected Outcome	Method of Delivery	Timeline
<p>4) A process for quickly identifying unmet needs for funds not obligated and for future funding requests. The focus is on conducting rapid needs assessment to identify needs that can be met through the emergency funds programs</p>	<p>PRDE indicated that, especially for emergency funds, they would like assistance conducting quick needs assessments to identify ways to use unobligated funds that align with the goals of the programs.</p> <p>Next Steps for PRDE: Identify PRDE lead(s) for this goal. The lead(s) will work with the Department to coordinate activities and better define the training need.</p>	<ul style="list-style-type: none"> Meet with PRDE staff to better define the topic and the critical components of the topic and how best to address this need. Initial ideas based on preliminary understanding of the topic below: <p>Utilizing the resource map and question guide from the ARP ESSER plan (above), create a template for other programs to use to map current fund initiatives to PRDE strategic goals and to guide the thought process when deciding upon additional initiatives.</p>	<p>At the end of this process, PRDE will better understand gaps with how their current implementation meets strategic goals and for what they need to utilize remaining funding.</p>	<p>Virtual and on-site</p>	<p>9 months</p>
<p>5) Facilitated review, with staff from both PRDE offices, for OESE programs on the statutory requirements for program monitoring as well as the essential elements in the Uniform Guidance</p>	<p>During the PRDE listening sessions and on-site meeting, PRDE staff indicated that they would benefit from additional training related to the uniform guidance and specifically the section related to monitoring.</p> <p>Next Steps for PRDE: Identify PRDE lead(s) for this goal. The lead(s) will work with the Department to coordinate activities and better define the training need.</p>	<ul style="list-style-type: none"> Meet with PRDE staff to better define the topic including the critical components of the topic in order to fully address this need. Initial ideas based on preliminary understanding of the topic below: Training focused on the sections of the Uniform Guidance that relate to monitoring. Primarily focusing on the grantee and subgrantee monitoring 		<p>T4PA Technical Assistance Center will develop the training session and deliver the training to PRDE staff. Virtual or On-site, as possible</p>	

TA Need	Issue	Recommended Solution	Expected Outcome	Method of Delivery	Timeline
		<p>requirements outlined in the Uniform Guidance. PRDE is interested in gaining a better understanding of how these requirements are applied to a governance structure that is unitary.</p> <ul style="list-style-type: none"> • Identify key documents that relate to the training session to translate. • Translate documents into Spanish to increase utilization and understanding amongst PRDE staff of the monitoring requirements outlined in the Uniform Guidance. 		<p>T4PA Technical Assistance Center, along with OSSS staff, will develop the training session and deliver the training to PRDE staff.</p>	
<p>6) Use of Funds (Blending/Braiding)</p>	<p>PRDE needs support in utilizing Federal funds across programs (e.g., use of Title I funds for school-wide activities for ALL students).</p>	<ul style="list-style-type: none"> • Meet with PRDE staff to better define the topic and the critical components of the topic and how best to address this need. Initial ideas based on preliminary understanding of the topic below: <p>In collaboration with OSEP and other ED program offices, develop additional fiscal sessions internally (cross-Department); and at PRDE central, regional, and local levels using a “Train-the-trainer” approach.</p>	<p>PRDE will become more knowledgeable regarding federal regulations governing how they use funds; fiscal resources and allowable uses of other (OSEP, OCTAE) funds.</p>	<p>Onsite or Virtual Webinars Training Modules (e.g., OESE & OSEP)</p>	<p>12-18 months for additional modules</p>

Office of Special Education and Rehabilitative Services (OSERS)

i. Office of Special Education Programs (OSEP)

TA Need	Issue	Recommended Solution	Expected Outcome	Method of Delivery /Who	Timeline
<p>Use of Funds</p> <ul style="list-style-type: none"> - Uniform Guidance - Blending/Braiding - IDEA - ARP - School-wide - State level funds - Other fiscal requirements 	<p>PRDE indicated that they would benefit from comprehensive training and guidance on how to properly utilize funds across programs, e.g., use of Title I funds for school-wide activities for ALL students; or use of IDEA funds for Coordinated Early Intervening Services.</p>	<p>In collaboration with the Office of Elementary and Secondary Education (OESE), Office of Non-Public and Private Education (ONPE), and other US Department of Education (ED) offices, where possible, develop IDEA 101 fiscal sessions at PRDE central, regional, and local levels using a “Train-the-trainer” approach.</p> <p>Office of Special Education Programs (OSEP), ONPE (as related to equitable services), and the National Center for</p>	<p>PRDE will become more knowledgeable regarding the allowable use of IDEA funds; fiscal resources and allowable uses of other (Title) funds. By doing so, PRDE will improve educational services for all children, including children with disabilities, which may also reduce the number of children identified as needing special education and related services.</p>	<p>Onsite – OSEP’s Fiscal Implementation Team (FIT)</p> <p>Train-the-trainer (NCSI)-fiscal</p> <p>Cross-Ed Departmental collaboration (e.g., OFO, OESE/Comp Center & OSEP)</p> <p>OSEP and ONPE (as related to equitable services) will develop a 3-4-day workshop to train PRDE (All Programs; Central Regional and local levels) on the</p>	<p>July 2022 – Nov 2023</p> <p>July 2022 Workshop</p> <p>Sep 2022 Follow-up/evaluation</p> <p>Spring and Fall 2023 Evaluate change</p>

TA Need	Issue	Recommended Solution	Expected Outcome	Method of Delivery /Who	Timeline
		<p>Systemic Improvement (NCSI) will also work with PRDE to develop a detailed plan, based on areas of need, to identify the appropriate TA Centers to support the work to improve services to students with disabilities.</p> <p>In order to address all the areas of need, OSEP, ONPE (as related to equitable services), and OSEP-funded TA centers will work with PRDE to conduct root cause analysis, and evaluate data to determine gaps in knowledge, student identification and the provision of appropriate services to students with disabilities.</p>		<p>Uniform Guidance and other Federal regulatory requirements relating to permissible uses of Federal (State) funds. Topics will include braiding, blending and sequencing funds in general – across all programs, and program only.</p> <p>OSEP will help PRDE Special ed program identify specific areas where change could be implemented and map a plan for implementing the change. There will be monthly follow-up and on-site follow-up/ evaluation in October 2022.</p>	

TA Need	Issue	Recommended Solution	Expected Outcome	Method of Delivery /Who	Timeline
<p>Training on select IDEA</p> <p>Program Requirements at PRDE</p> <p>Central/Regional/Local levels</p>	<p>PRDE indicated the need to strengthen its understanding/ knowledge regarding IDEA, general supervision (i.e., enforcement) requirements, and relationship between Sped and Title I, at all levels (Central, regional and local)</p> <p>Specific areas include:</p> <p>Evaluation</p> <p>Eligibility</p> <p>LRE</p> <p>Best practices for inclusion</p> <p>Implementation of multi-tiered systems of support (MTSS) through intervention models such as Positive Behavioral Interventions and Supports (PBIS) with fidelity.</p>	<p>OSEP/ONPE//TA Centers develop 101 IDEA program sessions to be disseminated at PRDE central, regional, local and at the parent levels using a “Train-the-Trainer” approach.</p>	<p>PRDE will become more knowledgeable regarding IDEA 611 and 619 programs; and the interaction with other ED programs. PRDE will also attain better oversight/enforcement of local programs to achieve improved results for students with disabilities, thus reducing the number of students found eligible for special education.</p>	<p>Onsite</p> <p>Coordination with OSEP, National Center for Systemic Improvement (NCSI) and other OSEP-funded TA Centers (and COMP Center)</p>	<p>July 2022</p> <p>Implementation timeline:</p> <p>October 2022 – Fall 2023</p>

TA Need	Issue	Recommended Solution	Expected Outcome	Method of Delivery /Who	Timeline
Timely Equipment/Assistive Technology Purchases	PRDE indicated that challenges in the procurement process; intervention of the TPFA; and shipment interruptions due to COVID-19, have increased the delay to access equipment and Assistive Technology (AT), which is a component of PRDE’s grant award specific condition regarding timely delivery of assistive technology.	In coordination with OFO, OSEP will work with PRDE to identify and mitigate challenges that address the timely delivery of assistive technology equipment.	Students will have access to a free appropriate public education (FAPE) in a timely manner and improved outcomes; PRDE will be released from specific condition related to timely delivery of AT.	Onsite ED -OSEP (Lynne Fairfax)/OFO coordinate with PRDE to implement a root cause analysis, review data, and determine best approach to resolving the issue.	July 2022- October 2022
Parent Public Relations Campaign (Related Services; placement vs location/culture)	Parents indicated that they would like to learn more about related special education services. They also indicated that the closure of schools because of structural damages has created concerns regarding the actual placement of students	Assist PRDE in identifying and coordinating TA/resources for public relations campaign to parents to train, inform, empower parents; support PRDE with fostering relations with parents, families, and communities around IDEA; and identify/mitigate the	Parents will become more knowledgeable about IDEA and its requirements. Parents will then begin to place more focus on academics and use related services for intended purposes.	Onsite Coordination with PRDE (Webinars, Parent conferences, public promotions and awareness, etc.), OSEP, ONPE (as related to equitable services), Puerto Rico’s OSEP-funded parent training and technical assistance	April 2022 – October 2022

TA Need	Issue	Recommended Solution	Expected Outcome	Method of Delivery /Who	Timeline
	with disabilities in special education vs. the location in which the education/related services take place.	impacts of the Rosa Lydia Valez consent decree on reducing the number of students identified as needing special ed and related services.		center (APNI), National Center for Systemic Improvement (NCSI), IDEA Part C Infants and Toddlers Program managed by the Puerto Rico Department of Health; and the OSEP-funded Early Childhood Technical Assistance center (ECTA) ONPE (as related to equitable services)	
Data & Evaluation	PRDE indicated the need to enhance staff knowledge regarding data utilization and effectiveness to inform, evaluate outcomes, and achieve results.	Assist PRDE in facilitating work across program offices and identifying resources through OSEP-funded TA providers such as the National Center for Systemic Improvement (NCSI) and IDEA Data Center (IDC) to improve use of data.	PRDE will enhance the use of data to make better decisions regarding the implementation of IDEA and improve results.	Onsite Coordination with PRDE, OSEP, ONPE (as related to equitable services),IDEA Data Center (IDC) TA and National Center for Systemic Improvement (NCSI).	Spring 2023- Spring 2024

TA Need	Issue	Recommended Solution	Expected Outcome	Method of Delivery /Who	Timeline
		PRDE may also consider collaborating with other States to learn from those States.			
Graduation/Dropout	PRDE indicated the need to identify resources and receive guidance to address the low graduation and high dropout rates of students with disabilities, especially since COVID-19.	Assist PRDE in facilitating work across program offices and identifying resources through technical assistance providers.	Special ed graduation and dropout rates will improve as will results for students with disabilities.	Onsite Coordination with OSEP and OSEP-funded technical assistance centers such as the National Technical Assistance Center on Transition (NTACT) and Comprehensive Center	Spring 2023- Spring 2024

b. Office of Career, Technical and Adult Education (OCTAE)

i. Division of Academic and Technical Education

TA Area	Issue	Recommended Solution	Expected Outcome	Method of Delivery	Person Providing TA	Timeline
Consolidated Annual Reporting	Challenges with the collection, validation and reporting of student enrollment and performance data.	Continued support on how to collect, validate and report the data.	PRDE will have completed all the reporting requirements for the Perkins Annual Report	Virtual meetings and ongoing email communication in Spanish.	José Figueroa	Nov 2021 -March 2022
Student Performance Measures	Challenges with understanding the new Perkins V Performance measures	Provide documentation and ongoing technical support in Spanish explaining the new Perkins V measures.	PRDE will accurately collect and report on all Perkins V performance measures in their annual report on January – March 2022.	Virtual meetings and ongoing email communication in Spanish.	José Figueroa	Feb – April, 2022
State Plan Requirements	Challenges with understanding the new Perkins V Performance measures	Provide documentation and ongoing technical support in Spanish explaining the new Perkins V measures.	PRDE will accurately complete and submit a new Perkins V State plan in May of 2022	Virtual meetings and emails in Spanish	José Figueroa	March – May, 2022
Comprehensive Local Needs Assessment	Challenges implementing the local	Continued support and follow-up the	PRDE will develop a comprehensive	Virtual meetings and ongoing email	Jose Figueroa	March – June 2022

TA Area	Issue	Recommended Solution	Expected Outcome	Method of Delivery	Person Providing TA	Timeline
	comprehensive needs assessment. Challenges creating a system wide (unitary) needs assessment tool for Perkins V	PRDE’s development of its comprehensive local and systemic needs assessment.	local and systematic needs assessment tool to inform the implementation of its Perkins V programs.	communication in Spanish.		
Local Applications	Challenges maintaining individual Perkins V local applications within a unitary system.	Continued support for and follow-up on PRDE’s development of its local and systemic local application process and tools.	PRDE will develop a local and systemic funding application mechanism that captures local and systemic programmatic and fiscal needs and progress of its Perkins V programs.	Virtual meetings and ongoing email communication in Spanish.	Jose Figueroa	Feb – June 2022
Correctional Education and Adult Education within Perkins V Initiatives	Challenges of how to integrate their correctional and adult education programs into existing and newly developed Perkins V programs.	Continued support for and follow-up on PRDE’s development of an integrated correctional and adult education program that	PRDE will develop an integration model that allows correctional and adult education students to	Virtual meetings and ongoing email communication in Spanish.	Jose Figueroa	May – June 2022

TA Area	Issue	Recommended Solution	Expected Outcome	Method of Delivery	Person Providing TA	Timeline
		links to existing and new Perkins V Career pathways.	seamlessly integrate into a career and technical education program.			
Establishing evening career and technical courses	Challenges of how to establish and fund evening career and technical education programs in local career and technical education schools.	Continued support for and follow-up on PRDE’s development of evening career and technical education courses at local career and technical education high schools.	PRDE will establish evening career and technical education programs in local schools for nontraditional, working students.	Virtual meetings and ongoing email communication in Spanish.	Jose Figueroa	April – June 2022
Data analytics	Challenges with data collection, validation, and analysis.	Continued support for and follow-up with data analysis strategies.	PRDE will improve the collection, validation and analysis of their Perkins programmatic and fiscal data.	Virtual meetings and ongoing email communication in Spanish.	Jose Figueroa	Jan – June 2022
Establishment of dual and concurrent enrollment programs	Challenges of how to establish dual concurrent enrollment programs that are aligned with	Continued support for PRDE’s efforts to establish dual concurrent enrollment	PRDE will develop and implement at least one dual concurrent Perkins V	Virtual meetings and ongoing email communication in Spanish.	Jose Figueroa	March – June 2022

TA Area	Issue	Recommended Solution	Expected Outcome	Method of Delivery	Person Providing TA	Timeline
	industry needs and standards.	programs of study.	enrollment program.			
Establishment of vertical and horizontal education agreements	Challenges on how to establish secondary to postsecondary and postsecondary to postsecondary articulation agreements.	Continued support for PRDE's development of secondary to postsecondary articulation agreements and the expansion of their career pathways and programs of study.	PRDE will develop and implement at least one vertical articulation and one horizontal articulation.	Virtual meetings and ongoing email communication in Spanish.	Jose Figueroa	March – June 2022
Sub-grantee monitoring process	Challenges with the development of a Perkins V monitoring tool and protocols.	Continued support for PRDE's development of their fiscal and programmatic sub-recipient monitoring protocols and instruments.	PRDE will develop a Perkins V monitoring guide and tools to assist in the oversight of their Perkins funded secondary and postsecondary recipients.	Virtual meetings and ongoing email communication in Spanish.	Jose Figueroa, Andrew Johnson	May – June 2022
2CFR and Permissible Costs under Perkins V	Challenges understanding the complexities of applicable Federal regulatory	Continued support for training opportunities and providing	PRDE will be able to successfully implement applicable	Virtual meetings and ongoing email communication in Spanish.	Andrew Johnson	Feb – June 2022

TA Area	Issue	Recommended Solution	Expected Outcome	Method of Delivery	Person Providing TA	Timeline
	requirements in 2 CFR and the Perkins's statute.	ongoing technical assistance (Q&As).	Federal regulatory requirements (in 2 CFR) and Perkins statutory requirements.			

ii. Division of Adult Education and Literacy

Adult Education TA Need	Issue	Recommended Solution	Expected Outcome	Method of Delivery	Timeline
<p>AEFLA Competition and Implementation</p>	<p>PRDE will administer a new Integrated English Literacy and Civics Education (IELCE) competition for workforce areas that currently do not have any providers.</p>	<p>Division of Adult Education and Literacy (DAEL) continue conversations with PRDE and provide technical assistance recommendations to PRDE AEFLA State director for the IELCE competition.</p> <p>DAEL provides a courtesy review of the PRDE RFP.</p>	<p>As needed, PRDE incorporates DAEL technical assistance recommendations into IELCE RFP.</p> <p>PRDE administers IELCE competition and awards new providers that can serve students in each of the identified workforce areas.</p>	<p>DAEL will begin bi-monthly technical assistance calls with PRDE AEFLA State Director</p>	<p>2/2022 – 7/2022</p>
<p>IELCE and Integrated Education and Training (IET) Implementation</p>	<p>PRDE requested assistance with identifying resources for IELCE and IETs</p>	<p>DAEL revisits the Literacy Information and Communication System (LINCS) resources that were highlighted during the November 2021 technical assistance visit and shares feedback with LINCS contractor</p> <p>DAEL discusses with PRDE the options available to possibly request IELCE and IET technical assistance</p>	<p>PRDE implements high quality IELCE and IET programs for each workforce area</p> <p>PRDE and local programs can accurately report IELCE and IET participant outcome data on the National Reporting System for Adult Education (NRS) tables.</p>	<p>DAEL shares LINCS information through bi-monthly TA calls</p> <p>DAEL/PRDE/LINCS identify resources for follow-up TA</p>	<p>02/2022 – 07/2022</p>

Adult Education TA Need	Issue	Recommended Solution	Expected Outcome	Method of Delivery	Timeline
		<p>through the LINCS contract</p> <p><i>If requested by PRDE, LINCS vendor can share 1-3 IELCE/IET resources</i></p> <p>DAEL facilitates conversations with Department of Labor (DOL) colleagues to help identify workforce needs and IET partnerships</p>			
<p>NRS Reporting (Performance Accountability)</p>	<p>Clarify with PRDE their assessment procedures for Adult Basic Education, Adult Secondary Education, and English Language Acquisition (ABE/ASE/ELA)</p> <p>Ensure that PRDE accurately reports IELCE and IET participant outcome data in the NRS.</p>	<p>DAEL and PRDE State AEFLA director discuss current assessment administration and identify potential opportunities to increase PRDE’s subject area assessments.</p> <p>DAEL will provide continued technical assistance to PRDE to review data for program improvement.</p>	<p>PRDE will be able to pull the correct WIOA performance indicator cohorts for reporting on the NRS tables.</p> <p>PRDE will increase reviewing participant data for program improvement and shared outcomes with local providers.</p> <p>PRDE will share strategies of data reporting to local programs.</p>	<p>Bi-monthly technical calls with continued discussions of data performance outcomes</p>	<p>2/2022–9/2022</p>

Adult Education TA Need	Issue	Recommended Solution	Expected Outcome	Method of Delivery	Timeline
<p>NRS Fiscal Reporting</p>	<p>PRDE can accurately report recipient share information on the federal financial reporting tables</p> <p>Ensure that PRDE draws down FY 2020 AEFLA funds by 1/28/2023</p> <p>Submit potential late liquidation requests for FY 2018 and FY 2019 grant funds.</p>	<p>DAEL will continue technical assistance discussions to help identify and clarify matching contributions and clarify the 90% maintenance of effort (MOE) requirements.</p> <p>DAEL will share revised AEFLA fiscal reporting responsibilities presentation for PRDE.</p> <p>DAEL will provide guidance to PRDE with the late liquidations process.</p> <p>DAEL and GRMSD will work in collaboration to monitor PRDE drawdown of PY 2020 AEFLA funds.</p>	<p>PRDE is able to accurately report recipient share in January 2023</p> <p>DAEL processes appropriate late liquidations for FY 2018 and FY 2019 funds. PRDE finalizes spending for approved AEFLA activities.</p>	<p>Bi-monthly technical assistance calls with DAEL and PRDE AEFLA State director.</p>	<p>2/2022 – 12/2022</p>