



THE NEW NEW APPR

***Overview of the new law
and regulations***

August 2015

What we will cover...

- How we got to this point and the basics of the new APPR
- Teacher evaluations
- Principal evaluations
- Some general provisions (e.g., APPR and tenure, APPR and dismissal)

Laws, regulations, guidance:

- 1) **Law** – enacted by Assembly, Senate, and Governor – created basic design: approval deadline, matrix with 2 axes, required and optional subcomponents, what must be locally negotiated. Can only be changed by amending the law (action by Legislature and Governor).
- 2) **Regulations** – approved by Board of Regents – fill in some details: example – weight given to measures used within categories for the two axes. Can be changed by action of the Board of Regents, following a process set in law (requires public comment period).
 - APPR regulations were adopted on an “emergency” basis (because law required the Regents to adopt regulations by 6/30/15). The Regents must still consider public comments and will reconsider regulations in September -- *so some of this could change*.
- 3) Some additional details addressed through **guidance** issued by State Education Department: example – process for hardship waivers from November 15 deadline. Can be changed by State Education Department staff.

Regulations must be consistent with laws and guidance must reflect what is said in law and regulation.

For the 5th time in 6 years, legislation has passed both houses making changes in teacher/principal requirements:

- **2010:** Original APPR law enacted to assist in winning Race to the Top funding
- **2012:** Significant changes enacted, at Gov. Cuomo’s instigation; districts required to have local plans approved by SED by 1/17/13 – or lose eligibility for state aid increases.
- **2013:** Limitations on release of individual evaluations results enacted
- **2014:** “Safety Net” proposed by Governor and passed by Senate and Assembly to limit adverse impact on overall ratings from measures tied to Common Core aligned state tests – *vetoed by Gov. Cuomo.*
- **2015:** New and “improved” APPR enacted (Education Law §3012-d).

Basic Design: Instead of a single composite score, a matrix (prescribed by law).

Old:

- 20% state provided growth score/ or locally developed analogue
- 20% locally assessed measures of student performance
- + 60% “other measures” (at least 31 points from observations)
- Composite Effectiveness Score (& “HEDI” Rating)

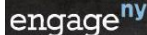
New:

All educators receive two ratings, one based on impact on student performance, the other on observations. The combination of results determines overall HEDI rating – *the matrix*.

The Matrix

(Part of law approved by Governor and Legislature – not Regents’ action)

		Observation			
		Highly Effective (H)	Effective (E)	Developing (D)	Ineffective (I)
Student Performance	Highly Effective (H)	H	H	E	D
	Effective (E)	H	E	E	D
	Developing (D)	E	E	D	I
	Ineffective (I)	D*	D*	I	I

* If a teacher is rated Ineffective on the Student Performance category, and a State-designed supplemental assessment was included as an optional subcomponent of the Student Performance category, the teacher can be rated no higher than Ineffective overall (see §3012-d (5)(a) and (7)). 

SOURCE: State Education Department presentations

Timeline Issues

- Districts are required to develop local plans and obtain State Education Department approval by November 15, 2015, or lose eligibility for any increase in state aid.
- SED advises that submission by October 1 is necessary to permit timely consideration (Department was responsive to our calls for streamlining the review room process).
- Under SED guidance districts may obtain a “hardship waiver,” allowing four additional months (to March 15, 2016) to negotiate and gain plan approval. Districts can apply between October 1 and October 31. Additional extensions are possible. Must show:
 - Evidence of good faith efforts to negotiate a new APPR plan in compliance with the new law;
 - Evidence of efforts to train staff on the new APPR procedures; and
 - Compliance with data reporting requirements for 2014-15 evaluations (**some due August 28**).
- Obtaining a waiver does not excuse districts from conducting evaluations – prior law (Education Law §3012-c) remains in effect.
- If a new plan is not in place by March 1, 2016, district is not required to implement new system until 2016-17 school year. However...
 - To go past March 1 a district will probably need to obtain a second waiver (may request between February 1 and March 1).
- For more information, see: <https://www.engageny.org/resource/hardship-waiver-implementation-education-law-3012-d>

Teacher Evaluations

Again, the basic design:

Two components create the rows and columns in the matrix:

1) Student Performance

- Requires the use of a state-provided growth score, if available; otherwise requires the use of a student learning objective (SLO).
- An optional second, “state-developed” growth score may be used, **subject to collective bargaining**.
- Optional second measure cannot comprise more than 50% of this rating.

2) Observations

- Requires observations by a supervisor and an independent evaluator from outside the school building.
- Districts also add an optional subcomponent to include observations conducted by a trained peer who has been rated Effective or Highly Effective, subject to collective bargaining.
- Supervisor observations must account for at least 80% of this rating; independent observations may account for 10-20%; and peer observations may account for the balance.
- **Implementation, including frequency and duration of observations, weightings of subcomponents, and selection of rubrics determined through local negotiation.**

Teacher Student Performance Category

Required Subcomponent (all measures must result in a 20 point scale)

- **State Provided Growth Score:** State-provided teacher growth scores comparing student growth to those with similar past test scores and includes considerations for poverty, ELL, and SWD status. *(for 2015-16, current SPG model will be used; SED will consult with stakeholders and experts on possible future changes).*
- Districts must have “back-up SLOs” set by their superintendent, in case there are not enough test results for SED to generate Growth Scores.

OR

- **Growth Using Student Learning Objectives (SLOs)** – all developed by superintendent or his/her designee (including targets) and approved by SED:
 - For subjects associated with a State assessment or Regents exam (or, in the future, with any new State assessments): **State/Regents assessment(s) must be used** as the evidence for the SLO.
 - For other grades/subjects where no State assessment or Regents exam currently exists, SLOs may be based on district-determined assessments from the options below:
 - State-approved assessment consisting of the following **(none approved yet)**:
 - State-approved third-party assessment (currently approved assessments may be resubmitted for approval; **must be able to measure one year of growth**).
 - State-approved district, regional, or BOCES-developed assessment (must be approved by SED and be **able to measure one year of growth**)
 - School- or BOCES-wide, group, team, or linked results based on State/Regents assessments.
 - **Superintendents must certify that all SLO growth targets represent at least one year of expected growth, consistent with state guidance.**

Teacher Student Performance Category, continued...

Optional Subcomponent: Locally Selected Measures of Growth, could be:

- **2nd State-provided growth score on a State-created or administered test**, provided that this is different than the measure used for the required student performance subcomponent:
 - Teacher-specific growth score computed by the State based on the percentage of students who achieve a State-determined level of growth (e.g., the percentage of students whose growth is above the median for similar students);
 - School-wide growth results based on a State-provided school-wide growth score for all students attributable to the school taking the State ELA or math assessment(s) in grades 4-8;
 - School-wide, group, team, or linked growth results using available State-provided growth scores computed in a manner determined locally.

OR

- **2nd growth score based on a State-designed or approved supplemental assessment, calculated using a State-provided or approved growth model.** **(None approved by SED as of now).**
 - Such growth score may include teacher-specific growth scores or a school or BOCES-wide, group, team, or linked results where a State provided or approved growth model is capable of generating such a score.
- All measures must result in a 20 point scale.
- Whether to use a second measure, and which measure to be used, must be locally negotiated.

Teacher Student Performance Category, continued...

Weightings within the Student Performance Category:

- If the optional second measure **is not used**, the mandatory subcomponent (Growth Score or SLO), comprises 100% of the Student Performance rating.
- If the optional second measure **is used**, the mandatory subcomponent (Growth Score or SLO) must account for at least 50% of the Student Performance rating. Within that limitation, the weights to be applied to the two subcomponents are to be set by negotiation.
- Under the matrix enacted into law:
 - if an optional second assessment based on a “state-designed or approved supplemental assessment is used, and
 - if the teacher receives an Ineffective rating on Student Performance,
 - then the teacher cannot be rated higher than Ineffective overall (more on this when we get to the matrix).

Teacher Student Performance Category, continued...

New student performance scoring ranges →

All assessments for APPR purposes must be capable of generating a growth score between zero and 20.

Again, SLO targets must assume at least 1 year's growth.

SLOs		Scoring Range	State-Provided Growth Scores	
Rating	Percent of Students Meeting Target		MGP Range	Rating
I	0-4%	0	3-23	I
I	5-8%	1	24	I
I	9-12%	2	25	I
I	13-16%	3	26	I
I	17-20%	4	27	I
I	21-24%	5	28	I
I	25-28%	6	29	I
I	29-33%	7	30	I
I	34-38%	8	31	I
I	39-43%	9	32	I
I	44-48%	10	33	I
I	49-54%	11	34	I
I	55-59%	12	35	I
D	60-66%	13	29-37	D
D	67-74%	14	38-40	D
E	75-79%	15	36-48	E
E	80-84%	16	49-55	E
E	85-89%	17	56-68	E
H	90-92%	18	67-68	H
H	93-96%	19	69-72	H
H	97-100%	20	73-94	H

Teacher Observations Category

- **Two required subcomponents:**
 - **Observation by a principal or other trained administrator** – must comprise at least 80% of the total observation score, but not more than 90%.
 - **Observation by an “impartial independent trained evaluator”** – must comprise at least 10% of the total observation score, but not more than 20%
 - At least one of these required observations must be unannounced.
- **Optional third subcomponent (if agreed to through negotiations):**
 - **Observation by a trained peer teacher** who was rated Effective or Highly Effective in the prior school year – may not comprise more than 10% of the total observation score.
- Within limits described above, weightings for the subcomponents will be determined through negotiations.
- Implementation is subject to negotiation – frequency, duration, rubric selection, and scoring ranges within parameters set by SED.

Teacher Observations Category, continued...

Rubrics

- All observations within a single school year for a teacher must use the same rubric (different rubrics may be used if a teacher teaches more than one grade or subject).
- Evaluators may select a limited number of observable rubric subcomponents for focus within a particular observation so long as all observable Teaching Standards/domains of the selected practice rubric are addressed across the total number of observations.
- **The law prohibits the use of teacher artifacts *as evidence of student performance*, including lesson plans and student portfolios (unless approved by SED), as well as parent or student surveys, professional goal-setting, or any assessments or growth targets not meeting minimum standards set by the Commissioner.**
- **However, points may be allocated based on an artifacts, if the artifact constitutes evidence of an otherwise observable rubric subcomponent** (e.g., a lesson plan viewed during the course of the classroom observation may constitute evidence of professional planning).
- Also, New York State Teaching Standards/domains that are part of the rubric but not observable during the classroom observation may be observed during any optional pre-observation conference or post-observation review or other natural conversations between the teacher and evaluator and incorporated into the observation score.

Teacher Observations Category, continued...

Items now prohibited from use by law:

“§3012-d (6) Prohibited elements. The following elements shall no longer be eligible to be used in any evaluation subcomponent pursuant to this section:

- a. evidence of student development and performance derived from lesson plans, other artifacts of teacher practice, and student portfolios, except for student portfolios measured by a state-approved rubric where permitted by the department;
- b. use of an instrument for parent or student feedback;
- c. use of professional goal-setting as evidence of teacher or principal effectiveness;
- d. any district or regionally-developed assessment that has not been approved by the department; and
- e. any growth or achievement target that does not meet the minimum standards as set forth in regulations of the commissioner adopted hereunder.”

General principle: SED is allowing use of some items if they can be related to an observable aspect of teacher performance.

Teacher Observations Category, continued...

Required: Observation by a principal or other trained administrator

- At least one observation by building principal or other trained administrator:
 - Observations may occur in-person or by live or recorded video, as determined locally.
 - Districts/BOCES may locally determine whether to use more than one observation by principal or other trained administrator.
 - “Nothing shall be construed to limit the discretion of management to conduct observations in addition to those required by this section for non-evaluative purposes. “
 - The frequency and duration of observations are locally determined through negotiation. “Walkthroughs” (frequent, short observations) are permissible.

Teacher Observations Category, continued...

Required: Observation by an impartial independent trained evaluator:

- There must be at least one observation conducted by an impartial independent trained evaluator. Districts/BOCES may locally determine whether to use more than one.
- Impartial independent trained evaluators are trained and selected by district/BOCES. They may be employed within the district, but may not be assigned to the same school building as the teacher being evaluated.
 - This could include other administrators, department chairs, or peers (e.g., teacher leaders on career ladder pathways), so long as they are not from the same building (defined as same BEDS code) as the teacher being evaluated.
 - Must be trained by the district in the use of the chosen rubric.
- Observations may occur in-person, or by live or recorded video, as determined locally.
- The frequency and duration of observations are locally determined through negotiation.

Teacher Observations Category, continued...

Optional: Observation by a peer teacher, trained and selected by the district or BOCES:

- A trained peer teacher must have been rated Effective or Highly Effective on his or her overall rating in the prior school year.
- A peer teacher observer may be from the same school or a different school within the district.
- Observations may occur in-person, or by live or recorded video, as determined locally.

Teacher Observations Category, continued...

Training required for independent and peer evaluators (from Commissioner's Regulations):

"Independent evaluators and peer evaluators shall receive training on the following elements:

- (1) the New York State Teaching Standards and their related elements and performance indicators and the Leadership standards and their related functions, as applicable;
- (2) evidence-based observation techniques that are grounded in research; and
- (3) application and use of the State-approved teacher or principal rubric(s) selected by the district for use in evaluations, including training on the effective application of such rubrics to observe a teacher or principal's practice."

Also,

"Districts shall also describe in their annual professional performance review plan their process for ensuring that all evaluators maintain inter-rater reliability over time (such as data analysis to detect disparities on the part of one or more evaluators; periodic comparisons of a lead evaluator's assessment with another evaluator's assessment of the same classroom teacher or building principal; annual calibration sessions across evaluators) and their process for periodically recertifying all evaluators."

Teacher Observations Category, continued...

- Each observation evaluation will be based on a 1-4 scale derived from the rubric, which will produce a 1-4 score for the teacher.
- Statewide scoring ranges, subject to negotiation locally within .25 decimal ranges:

Teacher Observations (and Principal School Visits):

	Minimum	Maximum
Highly Effective	3.50 to 3.75	4.0
Effective	2.50 to 2.75	3.49 to 3.74
Developing	1.50 to 1.75	2.49 to 2.74
Ineffective	0	1.49 to 1.74

- The average of the scores – weighted as negotiated within the prescribed limits – produces the overall observation category score.

Teacher Observations Category, continued...

An example

Assume:

- Local plan calls for 80% of Observation rating to be based on principal observations and 20% on Impartial independent evaluator observations
- Principal observations score is 2.50 (lowest possible Effective score)
- Independent observations score is zero.

Weighted total Observation score would be 2.00 – in the Developing range

$$(80\% \times 2.50) + (20\% \times 0) = 2.00 + 0 = 2.00$$

Putting the pieces together – back to the matrix

		OBSERVATIONS			
		Highly Effective	Effective	Developing	Ineffective
STUDENT PERFORMANCE	Highly Effective	Highly Effective	Highly Effective	Effective	Developing
	Effective	Highly Effective	Effective	Effective	Developing
	Developing	Effective	Effective	Developing	Ineffective
	Ineffective	Developing*	Developing*	Ineffective	Ineffective

* If a teacher is rated Ineffective on Student Performance and an optional second assessment using a state-designed/approved supplemental assessment, the teacher must be rated Ineffective overall. *Penalty does not apply if optional second measure is derived from a current state assessment.*

Two comments:

- If a truly good teacher is rated Effective or Highly Effective on Observations, the worst he or she can do overall is Developing (assuming the asterisk above does not apply).
- Conversely, a truly bad teacher might be spared an Ineffective rating by a strong Student Performance rating.

Principal Evaluations

Principal Evaluations

Same basic design:

- Matrix with Student Performance and Observations (called “Principal School Visits”), same weightings, same scoring ranges.
- **Student Performance Category** – State Provided Growth Score or SLO (must comprise at least 50% of rating, with option for a second, locally selected measure of growth.
- **Principal School Visit Category** – At least 80% of rating must be derived from visit by supervisor or other trained administrator and 10-20% from visit by impartial independent trained evaluator; option for a third subcomponent – visit by a trained peer principal, which may account for 20% .
- Same requirements regarding what must be negotiated.

Principal Student Performance Category

Required Subcomponent (all measures must result in a 20 point scale)

- **State Provided Growth Score:**

- Elementary/Middle Schools: Result of student growth measure as applied to State assessments in 4-8, ELA/math; Add grades and/or subjects as growth measure applies.
- High Schools (all of grades 9-12): Result of principal student growth percentile measure as applied to State assessments and/or graduation rates; Add subjects as growth measure applies.
- Where the State-provided growth score covers less than 30% of a principal's students, SLOs must be developed following the rules and options set forth for "all other building principals" -- unclear.

OR

- **Growth Using Student Learning Objectives (SLOs)** – all developed by superintendent or his/her designee (including targets) and approved by SED:

- For subjects associated with a State assessment or Regents exam (or, in the future, with any new State assessments): State/Regents assessment(s) must be used as the evidence for the SLO where they exist.
- For other grades/subjects where no State assessment or Regents exam currently exists, SLOs based on district-determined assessments from the options below:
- State-approved assessment consisting of the following:
 - State-approved third-party assessment (currently approved assessments may be resubmitted for approval ; must be able to measure one year of growth).
 - State-approved district, regional, or BOCES-developed assessment (must be approved by SED and be able to measure one year of growth).

Principal Student Performance Category, continued...

Optional Subcomponent: Locally Selected Measures of Growth

- The same locally selected measures of student growth across all buildings with the same grade configuration or program in district/BOCES must be used. Growth measures from these options:
 - A second State-provided growth score, provided that this is different than the measure used for the required student performance subcomponent:
 - Principal-specific growth computed by the State based on the percentage of students who achieve a State-determined level of growth (e.g., percentage of students whose growth is above the median for similar students).
 - School-wide growth results using available State-provided growth scores computed in a manner determined locally.
 - Growth scores based on a State-designed supplemental assessment, calculated using a State-provided or approved growth model (must be approved by SED).
 - Whether to use optional 2nd measure and which measure to use determined through local negotiations.

Principal School Visits Category

- **Rubrics**

- There will be a menu of State-approved rubrics (or State-approved variance to use alternative rubric) to assess performance based on ISLLC 2008 standards; Rubrics approved for use under Education Law §3012-c will be available for use under §3012-d. Additional rubrics may be approved by the Department through an RFQ process.
- All school visits for a principal for the year, and across observer types, must use the same approved rubric; provided that districts may locally determine whether to use different rubrics for a principal assigned to different grade level configurations or building types.
- Evaluators may select a limited number of observable rubric subcomponents for focus within a particular school visit, so long as all observable ISLLC 2008 standards are addressed across the total number of annual school visits.
- ***The law prohibits certain items from being used to derive evaluation scores. However:***
 - Leadership Standards and their related functions that are part of the rubric but not observable during the course of the school visit may be observed through other natural conversations between the principal and the evaluator and incorporated into the school visit score.
 - Points may not be allocated based on any artifacts, unless such artifact constitutes evidence of a rubric subcomponent observed during a school visit.
 - Professional goal-setting is a prohibited element of principal evaluations under Education Law §3012-d, but may be used to the extent that it is evidence from the school visit and related to a component of the selected practice rubric.

Principal School Visits Category, continued...

- **Required: At least one by a supervisor or other trained administrator:**
 - At least one school visit by supervisor or other trained administrator:
 - Districts/BOCES may locally determine whether to use more than one school visit by superintendent or other trained administrator.
 - “Nothing shall be construed to limit the discretion of a board of education or superintendent of schools from conducting additional school visits for non-evaluative purposes.”
- **Required: At least one school visit by impartial independent evaluator(s), trained and selected by the district/BOCES.**
 - May be employed within the district, but may not be assigned to the same school building as the principal being evaluated. This could include other administrators, department chairs/directors, or peers, so long as they are not from the same building (defined as same BEDS code) as the principal being evaluated.
 - Districts/BOCES may locally determine whether to use more than one school visit by impartial independent trained evaluator(s).
- **The frequency and duration of school visits are locally determined through negotiation.**
- **Superintendent could do both supervisor and independent observations.**
- **At least one of these visits must be unannounced. Visits may not be conducted by video, live or recorded.**

Principal School Visits Category, continued...

- **Optional: Visit by a trained peer principal:**
 - May include at least one school visit by peer principal trained and selected by the district or BOCES; must have been rated Effective or Highly Effective in the prior school year.
 - Again, principal visits may not be conducted by video, live or recorded.

Same scoring ranges and matrix as for teachers

General Provisions

Prior law (3012-c) remains in place

- If current plan expires without a negotiated and approved plan in place, evaluations are to be done in accordance with the current plan – *but if a new plan has not been approved and no hardship waiver has been granted, district loses eligibility for state aid increases.*
- APPR elements from prior law continuing:
 - **Evaluator training:** New law does require training for independent and peer evaluators.
 - **Teacher/Principal Improvement Plans :** New law provides TIPs/PIPs to be implemented 10/1, not 9/1 and clarifies they are to be developed by superintendent, at his/her discretion, without bargaining.
 - **Monitoring:** SED’s authority to monitor APPR compliance continues; Commissioner may order changes to a collective bargaining agreement to assure conformity with law.
 - **Appeals:** Prior rules continue; new regulations permit an appeal by an educator rated I on Student Performance but H on Observations/Visits, “based on an anomaly, as determined locally.”
 - **APPR Disclosure:** Prior law limiting disclosure of individual evaluation results continued, with clarification that reference to composite effectiveness scores now refers to overall ratings on Student Performance and Observations/School Visits and combined overall rating.

End of the process:

- The entire Annual Professional Performance Review is to be completed and provided to the teacher or the principal as soon as practicable but in no case later than September 1 next following the school year for which the teacher or principal's performance is measured.
- The teacher's and principal's score and rating on the observation/school visit category and in the optional subcomponent of the student performance category, if available, is to be computed and provided to the teacher or principal, in writing, by no later than the last day of the school year for which the teacher or principal is being measured, but in no case later than September 1 next following the school year for which the teacher or principal's performance is measured.
- Upon rating a teacher or a principal as Developing or Ineffective overall through an Annual Professional Performance Review, a district is to formulate and commence implementation of a TIP or PIP for that educator by October 1 next following the school year for which such teacher's or principal's performance is being measured, or as soon as practicable thereafter.

APPR and tenure

- 4-year probationary period for teachers and principals appointed on or after July 1, 2015 (date of board action).
- To receive tenure, teachers and principals must receive APPR ratings of Effective or Highly Effective in at least 3 of the 4 probationary years, exclusive of any breaks in service.
- A teacher or principal rated Ineffective in the 4th probationary year cannot be given tenure (the probationary period could then be extended by a year).
- Tenure can be awarded contingent on receiving the required minimum rating in the final year (if minimum rating is not received, grant of tenure is void).
- Special provisions for teachers with prior tenure.

APPR and termination of tenured teachers (Education Law §3020-b)

Effective July 1, 2015, expedited procedures for teachers with multiple consecutive APPR ratings of Ineffective:

- 2 consecutive Ineffective ratings:
 - Districts **may initiate** expedited termination procedure; hearing must be completed within 90 days.
 - “shall constitute prima facie evidence of incompetence that can be overcome only by clear and convincing evidence that the employee is not incompetent in light of all surrounding circumstances...”
- 3 consecutive Ineffective ratings:
 - Districts **must initiate** expedited termination procedure; hearing must be completed within 30 days.
 - “shall constitute prima facie evidence of incompetence that can be overcome only by clear and convincing evidence that the calculation of one or more of the teacher's or principal's underlying components on the [APPR evaluation] was fraudulent...”
- Decision to be rendered within 10 days of final hearing.
- *Evaluation results from prior years count (e.g., Ineffective ratings in 2012-13, 2013-14 and 2014-15 would trigger requirement to pursue expedited dismissal).*

Prohibition against assigning students “Ineffective” teachers 2 years in a row

- By law, districts are now prohibited from assigning students a teacher rated Ineffective in 2 consecutive years in the same subject.
- Districts may obtain a waiver if impracticable to comply through alternate arrangements (e.g., not enough qualified and adequately rated teachers). Must also have an improvement or removal plan for the teacher at issue.

More information:

From the State Education Department:

- **“Blue Memo” – 10-page guidance summary on the new law and regulations:** <https://www.engageny.org/file/131571/download/blue-memo-3012-d.pdf>
- **Overall Guidance:** <https://www.engageny.org/file/133336/download/appr-guidance-3012-d.pdf?token=JFCY56yc37NF6VhDyvT-cgn5FwR6Zo720G7THKAuag4>
- **Guidance on the Hardship Waiver process:** <https://www.engageny.org/resource/hardship-waiver-implementation-education-law-3012-d>
- **“Review Room Guidance”:** <https://www.engageny.org/resource/task-task-review-room-guidance-document-appr-3012-d>
- **Guidance on APPR deadlines:** <http://www.p12.nysed.gov/memos/tle/appr-deadline-and-timeline.pdf>
- **APPR regulations:** <https://www.regents.nysed.gov/common/regents/files/meetings/Revised%20Subpart%2030-2%2030-3.pdf>

From the Council:

- **Annotated APPR statute:** http://www.nyscoss.org/img/news/advocacy_o0u38pijly.pdf



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BY THE PEOPLE...
FOR THE PEOPLE...**