

## 2018-19 APPR Closeout and Data Submission

Implementation certification, data collection, and reporting

### Important Dates

As a reminder, when districts and BOCES submit their APPR Implementation Certification form, they assure the Department that all staff evaluation data will be submitted to the Department by the date requested, and that these data will be a complete and accurate representation of the information requested and include the Required and Optional Student Performance subcomponent scores, the Required and Optional Teacher Observation/Principal School Visit subcomponent scores, and the Overall rating for all teachers and principals employed by the district or BOCES.

**Therefore, to be eligible for an increase in State aid for 2019-20, all districts must report their Original and Transition (where applicable) subcomponent scores and overall ratings by October 18, 2019.** Local Level 1 data centers may require earlier due dates to allow sufficient time for processing. Please contact your Local Level 1 data center if you do not know their processing dates.

Date/Event	Description/Information
<i>June 28, 2019 – August 23, 2019</i> APPR Implementation Certification form submission	The APPR Implementation Certification form must be submitted by <b>August 23, 2019</b> by districts and BOCES. The form is one necessary component to demonstrate full implementation of your approved APPR plan for the 2018-19 school year and is used to determine eligibility for an increase in State aid for the 2019-20 school year for school districts only. The APPR Implementation Certification form must be signed by the superintendent/district superintendent and board president. The form is now available and must be submitted through the <a href="#">NYSED Application Business Portal</a> .
<i>July 1, 2019 – October 18, 2019</i> Submission of 2018-19 Evaluation Ratings and Subcomponent Scores	LEAs will report 2018-19 staff evaluation data to the Commissioner through the Student Information Repository System (SIRS) for all applicable teachers and principals. <b>These data must be submitted by October 18, 2019.</b>  All final and complete data, including original or transition (as applicable) scores for the Required and Optional (as applicable) Student Performance subcomponents, scores for the Required and Optional (as applicable) Teacher Observation/Principal School Visit subcomponents and the Overall rating.  <b>Complete 2018-19 Staff Evaluation Rating data must be submitted by October 18, 2019</b> for a district to be eligible for their increase in State aid.
<i>October 25, 2019</i> 2018-19 Statement of Confirmation of Staff Evaluation Implementation and Rating Verification Report(s) due	This form certifies the accuracy of the Staff Evaluation Rating data submitted as of the October 18, 2019 deadline. This form is required to be signed by the LEA's certifying official who verifies the data provided in the Staff Evaluation Rating Verification Report(s) generated by L2RPT.  The certification form will be available and must be submitted through <a href="#">NYSED Application Business Portal</a> , in the same location as the online APPR form.

## Reporting Requirements Related to Education Law §3012-d

All public school districts and BOCES are required to submit 2018-19 school year data to SIRS that include staff evaluation ratings used for APPR. Please share this information with personnel in your organization who have responsibility for data collection and reporting. *Please note that **Transition scores in each applicable subcomponent and Transition Overall ratings must be reported for all educators whose APPR measures incorporate the results of the grades 3-8 ELA and math State assessments and/or State-provided growth scores.** For educators whose APPR measures **do not** include the results of the grades 3-8 ELA and math State assessments and/or State-provided growth scores, **only Original scores and ratings are required.***

The table below summarizes the data elements that are required to be submitted for each teacher and principal evaluation **under Education Law §3012-d** via the Staff Evaluation Rating Template for the 2018-19 school year, exported from your local data system and submitted to the New York State Education Department's Student Information Repository System (SIRS).

<b>EDUCATORS RECEIVING ORIGINAL SCORES AND RATINGS ONLY</b> (The evaluation measures per the LEA's approved APPR plan DO NOT incorporate the results of the grades 3-8 ELA/Math State assessments and/or State-provided growth scores)	
Evaluation Category	Description
Student Performance Category	Original Required Student Performance subcomponent scores reported as a whole number from 0-20, using the following code: REQSP. Original Optional Student Performance subcomponent scores, as applicable, reported as a whole number from 0-20, using the following code: OPTSP.
Teacher Observation/Principal School Visit Category	Original Required Teacher Observation/Principal School Visit subcomponent scores reported as a number from 1.00-4.00 or 0.00, using the following code: REQOB. Original Optional Teacher Observation/Principal School Visit subcomponent scores, as applicable, reported as a number from 1.00-4.00, using the following code: OPTOB.
Overall Evaluation Rating Category	Original Overall ratings reported using the following codes: OCR04 = highly effective, OCR03 = effective, OCR02 = developing, OCR01 = ineffective based on the matrix prescribed in Education Law §3012-d(5).
<b>EDUCATORS RECEIVING TRANSITION SCORES AND RATINGS ONLY</b> (The Original evaluation measures per the LEA's approved APPR plan incorporate the results of the grades 3-8 ELA/Math State assessments and/or State-provided growth scores. <i>Although the LEA's approved plan includes measures based on 3-8 ELA/Math State assessments and/or SPG scores, these measures should be excluded, and only the transition measures will be used for this group of educators</i> )	
Evaluation Category	Description
Student Performance Category	Transition Required Student Performance subcomponent scores, as applicable, reported as a whole number from 0-20, using the following code: TREQSP. Transition Optional Student Performance subcomponent scores, as applicable, reported as a whole number from 0-20, using the following code: TOPTSP.
Teacher Observation/Principal School Visit Category	Transition Required Teacher Observation/Principal School Visit subcomponent scores reported as a number from 1.00-4.00 or 0.00, using the following code: TREQOB. Transition Optional Teacher Observation/Principal School Visit subcomponent scores, as applicable, reported as a number from 1.00-4.00, using the following code: TOPTOB.
Overall Evaluation Rating Category	Transition Overall ratings reported using the following codes: TOCR04 = highly effective, TOCR03 = effective, TOCR02 = developing, TOCR01 = ineffective based on the matrix prescribed by Education Law §3012-d(5).

If you have any questions about these technical data reporting requirements, please contact your RIC or Big 5 City School District data center or the Office of Information and Reporting Services through [Datasupport](#).

All districts and BOCES have an APPR Summary available through the [IRS Portal](#) to assist with the calculation, distribution, and data submission of staff evaluation scores and ratings. An explanation and examples of the APPR Summary, other [helpful information for the closeout of 2018-19 APPR](#), and [resources related to Education Law §3012-d](#) are available on EngageNY. If you have any questions or require technical assistance with your APPR plan, please contact [educatoreval@nysed.gov](mailto:educatoreval@nysed.gov).

# Frequently Asked Questions

## General Questions

### **Q1: Other than the 2018-19 APPR Implementation Certification Form, what further information is required to be submitted to the Department to demonstrate full implementation of my district's 2018-19 APPR plan?**

A: LEAs must report 2018-19 final and complete data, either Original or Transition scores and ratings, for all applicable teachers and principals to the New York State Education Department's Student Information Repository System (SIRS) by October 18, 2019.<sup>1,2</sup> Required elements can be found in the table in Q12 of this FAQ.

In addition, the 2018-19 Statement of Confirmation of Staff Evaluation Rating Verification Report is required to be signed by the LEA's certifying official who verifies the data submitted to the Department by October 25, 2019. By signing the Implementation Certification form that is due to the Department on August 23, 2019, LEAs assured that all data will be submitted to the Commissioner starting on July 1, 2019 to the extent practicable, and that all data submitted to the Commissioner by October 18, 2019 will be a complete and accurate representation of the information requested and includes all required scores and ratings consistent with the implemented 2018-19 APPR plan for all teachers and principals employed by the district or BOCES, for the 2018-19 school year.

However, please be advised that pursuant to Education Law §3012-c(9)<sup>3</sup>, the Department reserves the right to monitor and take appropriate action with districts, including potential loss of State aid, if a district is not fully implementing their approved APPR plan in accordance with the law and regulations.

### **Q2: When is the information related to the 2018-19 school year due to the Department?**

A: Submission of staff evaluation data for classroom teachers and building principals for the 2018-19 school year is required to be submitted starting on July 1 to the extent practicable; however, the submission of 2018-19 full and complete data, including all required Original or Transition scores and ratings consistent with the implemented 2018-19 APPR plan are due to the Department by no later than **October 18, 2019**<sup>4</sup> Please note: Local Level 1 data centers will require earlier due dates to allow sufficient time for processing.

In addition, the Statement of Confirmation of 2018-19 Staff Evaluation Rating Certification Report form is required to be signed by the LEA's certifying official by **October 25, 2019**.

### **Q3: Why do we need to submit this information? What happens if we do not submit data?**

A: If your school district/BOCES has a 2018-19 APPR plan approved by the Commissioner, it is expected that the district/BOCES will have taken the steps necessary to carry out the evaluations of classroom teachers and building principals in accordance with the approved APPR plan. Therefore, the Commissioner requires proof of submission of preliminary staff evaluation data for classroom teachers and building principals for the 2018-19 school year by no later than July 1, 2019, to the extent practicable, and a certification by the superintendent of schools that final, complete data including all required Original or Transition (as applicable) scores and ratings consistent with the implemented 2018-19 APPR plan will be submitted by October 18, 2019.<sup>5</sup> As a reminder, pursuant to Education Law §3012-d(11), school districts must demonstrate that they have implemented their APPR plans in the prior school year in order to be eligible for an increase in State aid for the coming school year.

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<sup>1</sup> Please see Section M5 of the [§3012-d APPR Guidance](#).

<sup>2</sup> Please see Sections C21-C28 of the [§3012-d APPR Guidance](#).

<sup>3</sup> Education Law §3012-c(9) is made applicable to APPRs completed pursuant to Education Law §3012-d through Education Law §3012-d(15) and §30-3.13 of the Rules of the Board of Regents.

<sup>4</sup> Please see Section C27 of the [§3012-d APPR Guidance](#).

<sup>5</sup> Please see Section C28 of the [§3012-d APPR Guidance](#).

## Data Submission Questions

### **Q4: How are the data submitted?**

A: Districts and BOCES should follow typical protocol for data submission. For questions regarding loading staff evaluation data into SIRS, please contact your RIC/Big 5 City School District data center. A list of [Level 1 data center contacts](#) is posted online.

### **Q5: What format should be used to submit the data?**

A: Some districts and BOCES have Professional Development, Instructional Information, Human Resources, or Financial Systems that allow users to enter Annual Professional Performance Reviews and export the data in the New York State data collection format. Other LEAs create spreadsheets in the NYS data collection format, while others manually enter the data in the Level 0 application. Follow typical protocol for data submission and/or formatting. If you have additional questions you may want to contact your Level 1 data center.

### **Q6: Are we required to report both teacher and principal data?**

A: Yes, both teacher and principal data are required to be submitted to the Department.

### **Q7: What educator ID should be used when submitting the data?**

A: Staff Evaluation Rating records can be submitted using either the local ID (field 2) or the Alternate Staff (TEACH) ID (field 14). Either field 2 or field 14 is used, not both. The ID used (field 2 or 14) must match that defined in the Staff Snapshot table. This ID matches the staff person's TEACH ID held in the NYSED's Teacher certification database.

### **Q8: Should NYS grades 3-8 ELA/math assessments and State-provided growth scores be used for staff evaluation for 2018-19?**

A. On April 12, 2019, Governor Andrew Cuomo signed Chapter 59 of the Laws of 2019, which amends Education Law §3012-d. As a result of these amendments, the transition measures included in the approved APPR plan will continue to be used in determining scores and ratings instead of the grades three through eight ELA and math State tests (and State-provided growth scores). Therefore, the original measures based on the grades 3-8 ELA and math State assessments and/or State-provided growth scores are no longer required to be calculated or provided to educators for advisory purposes.

### **Q9: Do Transition scores and ratings need to be submitted for all educators?**

A: Transition scores and ratings are required to be submitted instead of Original scores and ratings for **all** educators whose evaluation scores and ratings are determined using the NYS grades 3-8 ELA/Math assessments or State-provided growth scores, in whole or in part. This includes grades 3-8 ELA/math teachers, principals of grades 3-8 and 9-12, in addition to any other educator assigned a school-, program-, district-, or BOCES-wide measure that is based on the NYS grades 3-8 ELA/Math assessments or State-provided growth scores, in whole or in part. For these educators, only Transition scores and ratings should be submitted; the original measures based on the grades 3-8 ELA and math State assessments and/or State-provided growth scores are no longer required to be calculated or provided to educators for advisory purposes.

Only Original staff evaluation scores and ratings should be submitted for those educators whose evaluation scores and ratings **are not** determined using the NYS grades 3-8 ELA/Math assessments or State-provided growth scores, per Task 2/Task 7 of the [approved APPR plan for 2018-19](#).

Further information on the submission of staff evaluation scores and ratings is included on EngageNY under [Resources for Closeout of 2018-19 APPR](#).

**Q10: How do we determine which educators receive Transition scores and ratings?**

A: All educators whose evaluation scores and ratings **would have been** determined, in whole or in part, using NYS grades 3-8 ELA/Math assessments or State-provided growth scores, based on Task 2/7 of the approved APPR plan for 2018-19, require Transition scores and ratings based on Task 2/7 Transition of the APPR plan.

Updated APPR summaries have been posted in the [IRS Portal](#) for all districts and BOCES with approved APPR plans for the 2018-19 school year. This APPR summary provides information from the approved APPR plan on measures and assessments, HEDI scoring ranges for observations and principal school visits, and subcomponent weighting, as applicable. The APPR summary is broken into groups of educators based on the use of optional subcomponents and the type of scores and ratings needed (original or transition) and provides a description of the items that should be distributed to educators as their final staff evaluation and those that should be submitted to the Department for the October 18, 2019 staff evaluation data submission deadline.

Detailed information and examples of the APPR summaries can be found on the [Resources for Closeout of 2018-19 APPR page](#) on EngageNY. Questions regarding APPR summaries can be directed to [EducatorEval@nysed.gov](mailto:EducatorEval@nysed.gov). Regional Information Centers have also received an APPR summary for all LEAs in their area.

**Q11. Will any educator receive two sets of scores and ratings (both Original and Transition)?**

All educators will receive only one set of scores and ratings, either Original or Transition, based on the measures and assessments indicated in Task 2/Task 7 of the approved APPR plan.

All educators whose evaluation scores and ratings **would have been** determined using the NYS grades 3-8 ELA/Math assessments or State-provided growth scores, in whole or in part based on Task 2/Task 7 of the approved APPR plan require Transition scores and ratings. These educators are found in Task 2/Task 7 Transition of the approved APPR plan for 2018-19.

Educators whose evaluation scores and ratings **are not** determined using the NYS grades 3-8 ELA/Math assessments or State-provided growth scores, per Task 2/Task 7 of the approved APPR plan, require only Original scores and ratings.

**Q12: What elements are required to be submitted to the Department for each teacher and principal in the Staff Evaluation Rating template?**

A: The table below summarizes the data elements required to be submitted via the Staff Evaluation Rating Template, exported from your local data systems for each teacher and principal under Education Law §3012-d.

<b>EDUCATORS RECEIVING ORIGINAL SCORES AND RATINGS ONLY</b> (The evaluation measures per the LEA's approved APPR plan DO NOT incorporate the results of the grades 3-8 ELA/Math State assessments and/or State-provided growth scores)	
<b>Evaluation Category</b>	<b>Description</b>
<b>Student Performance Category</b>	Original Required Student Performance subcomponent scores reported as a whole number from 0-20, using the following code: REQSP. Original Optional Student Performance subcomponent scores, as applicable, reported as a whole number from 0-20, using the following code: OPTSP.
<b>Teacher Observation/Principal School Visit Category</b>	Original Required Teacher Observation/Principal School Visit subcomponent scores reported as a number from 1.00-4.00 or 0.00, using the following code: REQOB. Original Optional Teacher Observation/Principal School Visit subcomponent scores, as applicable, reported as a number from 1.00-4.00, using the following code: OPTOB.
<b>Overall Evaluation Rating Category</b>	Original Overall ratings reported using the following codes: OCR04 = highly effective, OCR03 = effective, OCR02 = developing, OCR01 = ineffective based on the matrix prescribed in Education Law §3012-d(5).



<b>EDUCATORS RECEIVING TRANSITION SCORES AND RATINGS ONLY</b>	
(The Original evaluation measures per the LEA's approved APPR plan incorporate the results of the grades 3-8 ELA/Math State assessments and/or State-provided growth scores. <i>Although the LEA's approved plan includes measures based on 3-8 ELA/Math State assessments and/or SPG scores, these measures should be excluded, and only the transition measures will be used for this group of educators</i> )	
<b>Evaluation Category</b>	<b>Description</b>
<b>Student Performance Category</b>	Transition Required Student Performance subcomponent scores, as applicable, reported as a whole number from 0-20, using the following code: TREQSP. Transition Optional Student Performance subcomponent scores, as applicable, reported as a whole number from 0-20, using the following code: TOPTSP.
<b>Teacher Observation/Principal School Visit Category</b>	Transition Required Teacher Observation/Principal School Visit subcomponent scores reported as a number from 1.00-4.00 or 0.00, using the following code: TREQOB. Transition Optional Teacher Observation/Principal School Visit subcomponent scores, as applicable, reported as a number from 1.00-4.00, using the following code: TOPTOB.
<b>Overall Evaluation Rating Category</b>	Transition Overall ratings reported using the following codes: TOCR04 = highly effective, TOCR03 = effective, TOCR02 = developing, TOCR01 = ineffective based on the matrix prescribed by Education Law §3012-d(5).

**Q13: Can the reported numerical scores contain decimals?**

A: Required Teacher Observation/Principal School Visit subcomponent scores will be a score of 0.00 or from 1.00 to 4.00, Optional Teacher Observation/Principal School Visit subcomponent scores will be a score from 1.00 to 4.00. These scores may contain up to two decimal places (see, e.g., pages 25-26 of [APPR Guidance \(§3012-d\)](#)).

Required and Optional Student Performance subcomponent scores may not be reported as decimals and should be a whole number from 0 to 20.

**Q14: How do I find out if our data has been submitted to the Department? I think we submitted our full and complete data set, but I would like to confirm and verify the data. How do we do so?**

A: Your submitted data can be viewed in L2RPT- SIRS 326 Staff Evaluation Rating Verification Report in the Level 2 (L2RPT) Reporting System. If your data is not available in L2RPT, please follow typical protocol for questions surrounding data submission, which may include contacting your Level 1 data center to determine if data has been submitted and that the person attempting to review the data has the proper entitlements to that report.<sup>6</sup>

*Please note:* Staff Evaluation Rating Records can only be verified in the SIRS 326 Staff Evaluation Rating Verification Report. The report is a district-only report and, as such, only users with district-level accounts can view and verify this data if provisioned (entitled) in SEDDAS. The user must be granted access to L2RPT and Staff Evaluation (or Staff Evaluation Only) for the L2RPT application in SEDDAS.

**Q15: What should I do if there are incorrect data in my Staff Evaluation Rating Report?**

A: Prior to the deadline of October 18, 2019, districts and BOCES should verify the data submitted to the Department Level 2 (L2RPT).

If you believe there has been an error in the data reported to the Department, please check your source data to confirm that the data submitted to the Department are the correct data. If an error still exists after confirming your source data, contact your RIC/Big 5 City School District data center through your local data coordinator to

<sup>6</sup> Please see Section M50 of the [§3012-d APPR Guidance](#).

confirm that the data submitted to the Department are the correct data before the October 18, 2019 deadline.<sup>7</sup> After the October 18, 2019 submission deadline, changes for staff evaluation data will be handled through the [Level 0 Historical application](#). More information about the availability of Level 0 Historical will be communicated from the Office of Information Reporting Services after the initial reporting cycle is complete.

**Q16: We do not have full and complete data for all of our educators. What data do we submit to the Department for those educators with incomplete subcomponent scores/ratings? Should a zero be used for an incomplete subcomponent score?**

A: Full and complete data, including all required original or transition scores and ratings consistent with the implemented 2018-19 APPR plan are due to the Department no later than **October 18, 2019**<sup>8</sup>. If for some reason districts/BOCES have one or more educator(s) who are missing a subcomponent evaluation score, districts/BOCES should **not** report any missing or incomplete subcomponent(s) and should **not** report an Overall rating for those educator(s) who are missing one or more subcomponent score(s). A value of zero should only be reported for an educator's subcomponent score when the evaluation requirements for the subcomponent have been completed and the educator's performance merits a score of zero.

For comparison purposes and to help determine the initial and approximate completeness of reporting, the Department will utilize the total count of teachers and principals reported as part of the SIRS Staff Snapshot data collection to estimate how many educators should have evaluation data. Because Staff Snapshot includes educators who are not required to be evaluated under Education Law §3012-d, this data will only be used to establish an estimate of the number of teachers and principals with associated evaluation data.

**Q17: Should an Overall Rating be reported for an educator who is missing a subcomponent?**

A: No, districts/BOCES should **not** report an Overall rating for an educator who is missing one or more subcomponent score(s).<sup>9</sup>

**Q18: If an educator is missing a subcomponent, should that educator be left out of the data file?**

A: No, districts and BOCES must submit all complete data sets for that educator even if there are one or more subcomponents missing (see Q16 and 17 above). However, an Overall rating should not be submitted for an educator who is missing one or more subcomponents.<sup>10</sup> Further information on the submission of transition scores and ratings is included on EngageNY under [Resources for Closeout of 2018-19 APPR](#).

**Q19. How do I report an educator who was subject to evaluation under Education Law §3012-d, but for whom there are no staff evaluation data (i.e. missing all subcomponents)?**

A. In the rare instance whereby an educator was subject to evaluation under Education Law §3012-d, but is missing all subcomponents, report this information within the 2018-19 Statement of Confirmation of Staff Evaluation Rating Verification Report Form located on [NYSED's Application Business Portal](#).

This reporting will require the following information:

- Educator's Teach ID
- The name of the educator
- A selection from the drop-down menu indicating that there was no staff evaluation data reported for this individual<sup>11</sup>

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<sup>7</sup> Please see Section M51 of the [§3012-d APPR Guidance](#).

<sup>8</sup> Please see Section M52 of the [§3012-d APPR Guidance](#).

<sup>9</sup> Please see Section M53 of the [§3012-d APPR Guidance](#).

<sup>10</sup> Please see Section M54 of the [§3012-d APPR Guidance](#).

<sup>11</sup> Please see Section M55 of the [§3012-d APPR Guidance](#).



**Q20: If an educator's score is the subject of an ongoing appeal that will not be resolved by October 18, 2019 what data should be submitted? If we have submitted and certified our data, but, due to an appeal an educator's score changes after October 18, 2019 and/or October 25, 2019, what action is needed?**

A: The data submitted to the Department by October 18, 2019 must be complete data as of that date. The Department understands that as a result of appeals, data may still be the subject of change after October 18, 2019 and/or October 25, 2019. Changes for staff evaluation data after this date(s) will be handled through the [Level 0 Historical application](#) for LEAs with approved appeals. More information about the process for submitting changes will be made available after the initial reporting cycle is complete.<sup>12</sup>

## Statement of Confirmation of Staff Evaluation Rating Verification Report Questions

**Q21: Where do I find the 2018-19 Statement of Confirmation of Staff Evaluation Rating Verification Report?**

A: The certification form will be available in SED Monitoring through [NYSEd's Application Business Portal](#), in the same location as the online APPR submission form.<sup>13</sup>

**Q22: How do I submit the 2018-19 Statement of Confirmation of Staff Evaluation Rating Verification Report?**

A: The certification form must be submitted through [NYSEd's Application Business Portal](#), in the same location as the online APPR submission form.<sup>14</sup>

**Q23: What information needs to be included on the 2018-19 Statement of Confirmation of Staff Evaluation Rating Verification Report?**

A: The 2018-19 Statement of Confirmation of Staff Evaluation Rating Verification Report is an online form that requires districts and BOCES to provide the following information:

- 1) A statement confirming that the Staff Evaluation Rating Verification Report(s) which were generated using the Level 2 Reporting System have been viewed, including the date on which they were viewed;
- 2) A statement confirming the accuracy of the data reported, or a statement that the accuracy of data reported cannot be confirmed; the option is also provided to indicate that there are teachers subject to evaluation under Education Law §3012-d for whom staff evaluation data was not submitted;
- 3) The name of the district or BOCES official providing the certifications; and
- 4) The title of the district or BOCES official providing the certifications.

Additionally, the form includes a section enabling districts/BOCES to submit information for an educator missing staff evaluation data in its entirety.

**Q24: What is the reason I would list an educator on the 2018-19 Statement of Confirmation of Staff Evaluation Rating Verification Report?**

A: Educators who were subject to evaluation under Education Law §3012-d, but for whom staff evaluation data were not submitted<sup>15</sup> should be listed on the 2018-19 Statement of Confirmation of Staff Evaluation Rating Verification Report.

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<sup>12</sup> Please see Section M56 of the [§3012-d APPR Guidance](#).

<sup>13</sup> Please see Section M57 of the [§3012-d APPR Guidance](#).

<sup>14</sup> Please see Section M58 of the [§3012-d APPR Guidance](#).

<sup>15</sup> Please see Section M55 of the [§3012-d APPR Guidance](#).