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Comments Regarding Rhode Island's *Every Student Succeeds Act (ESSA)* State Plan

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Thank you for the opportunity to review and provide comments on Rhode Island's *Every Student Succeeds (ESSA)* State Plan. This plan lays out our state's priorities and provides a roadmap for how we can ensure that all of our state's children receive the education they need from early childhood through high school to graduate ready for success in college, careers, and life. We appreciate the opportunity to comment and hope you will consider our recommendations as you finalize the plan prior to submission in September.

Ambitious Long-Term Goals (p.15-19)

We were pleased to see ambitious long-term goals for academic achievement and high school graduation rates for all students and for student subgroups, including goals to achieve a 75% proficiency rate in English language arts and math for students in grades 3-8 and a 95% four-year high school graduation rate.

Recommendation: We recommend including the Governor's ambitious goal to ensure that 75% of third graders are proficient in reading by 2025 as the foundation for promoting proficiency for students in grades 3 through 8. We recommend focusing resources to achieve this foundational goal by 2025, rather than diluting resources to achieve the goal across grades 3 through 8. (See page 15)

Recommendation: LEARN Act: Ensure that the state applies for and uses the Literacy Education for All, Results for the Nation (LEARN) grant program to support state and local activities for children birth to third grade to create early literacy materials, provide professional development for teachers, and other literacy supports to parents, providers, schools, and other staff working with young children. (See page 15).

Recommendation: We recommend that the state include goals for five- and six-year graduation rates as well. We recommend a long-term goal of 97% of students graduating within five years and 98% of students graduating within six years by 2025. Five- and six-year graduation goals are particularly important for specific subgroups of students, including students with disabilities and English Learners, who may need additional time and support to obtain their high school diploma. (See pages 18-19)

School Quality or Student Success Indicators (p. 28-30)

We were very pleased that the plan includes four important indicators of school quality and student success – chronic absenteeism, student suspensions, high school graduate proficiency/Commissioner's Seal, and post-secondary success. We hope that the inclusion of these indicators in the plan is a strong

signal that improving these measures is a priority for the Department and the state, that goals for improving each of these indicators will be established and publicly tracked, and that we will have the opportunity to partner with you on strategies for improving our state's outcomes in all of these areas.

Recommendation: We recommend adding one more indicator of school quality and student success: implementation of high-quality kindergarten transition practices, including gathering information on children's skills and knowledge at kindergarten entry. Gathering data at kindergarten entry is an important strategy to support achievement of the third grade reading goal as well as a strategy to improve school climate. At kindergarten entry, schools should gather information from families, early childhood programs, and kindergarten teachers to better understand how to support children's development and learning across all domains of learning (language/literacy, cognition/general knowledge, social-emotional, physical well-being and motor skills, and approaches to learning). Because this would be a new practice in Rhode Island that would take several years to roll out, we recommend measuring and reporting *implementation* by schools and districts rather than reporting kindergarten assessment data. After the practice has been established statewide, RIDE could consider reporting kindergarten assessment (or "profile" data by school, district, and state. (See pages 28-30)

Recommendation: Establish long-term goals for reducing chronic absence and suspension rates. Based on current chronic absence rates, we would recommend a goal of reducing chronic absence rates to 5% in elementary schools, 10% in middle schools, and 15% in high schools by 2025. Based on current out-of-school suspension rates and new legislation passed in 2016 that restricts the use of out-of-school suspensions, we would recommend a goal of reducing the out-of-school suspension rate to 5 per 100 students and eliminating out-of-school suspensions for students in grades PK-3. When more data are available on the baseline for high school graduation proficiency and post-secondary success, we recommend setting ambitious but achievable goals for these indicators as well. (See pages 28-30)

Report Cards (p. 11, 13, 32, 61)

We were very pleased to see a plan to include a "broader range of measures" on state, district, and school report cards. However, we were disappointed that the design and list of indicators to appear on report cards has not yet been publicly released and is not in this draft plan. We strongly support the plan to include performance data for students experiencing homelessness, students in foster care, students in the juvenile justice system, and military-dependent students on report cards and hope that such data will include not just results of achievement tests but also chronic absence, suspension, and high school graduation rates.

Recommendation: We recommend that a list of indicators to appear on state, district, and school report cards be made public and that, at a minimum, state-level data on English language arts and math achievement, high school graduation rates, chronic absence rates, and out-of-school suspension rates for students experiencing homelessness, students in foster care, students in the juvenile justice system, and military depending students be included. (See pages 11, 13, 32, and 61)

Recommendation: We recommend LEA report cards include at least two indicators recognizing the importance of early learning opportunities for young children. We recommend inclusion of BrightStars ratings for both public-school-operated and

community-based early learning centers in the municipality(ies) served by the LEA. We also recommend inclusion of participation rates for four-year-olds in Head Start or State Pre-K by district. Rhode Island KIDS COUNT publishes this data annually. (See page 32)

Technical Assistance and School Improvement (p.43-50)

We were pleased to see the plan to provide support for school improvement, including a centralized resource hub and the requirement for LEAs with schools in need of comprehensive support to establish Community Advisory Boards.

Recommendation: We recommend highlighting the resources that are being developed by RIDE to help LEAs implement high-quality early learning practices, including operating high-quality preschool classrooms, participating in the BrightStars Quality Rating and Improvement System, using Title I funds to implement evidence-based home visiting programs and preschool classrooms, and partnering with high-quality community-based early childhood programs. We also recommend requiring that LEAs with schools in need of comprehensive support include Head Start and other key early childhood and after school/summer programs on their Community Advisory Boards. (See page 43 – 44)

Recommendation: We recommend including at least one early learning example in the Innovation Grants section, such as partnering with community-based early learning programs to establish an Age 3 through Grade 3 learning community with aligned curriculum, shared professional development, and early support for English language learners. (See page 48-49)

School Transitions (p. 56-57)

We were pleased that the Memorandum of Understanding between RIDE and DCYF was highlighted in the School Transitions section as well as the Early Warning System for students in grades 6-12.

Recommendation: Include a plan to support transition into kindergarten as a core strategy to achieve the third grade reading goal. The kindergarten transition strategy should include helping schools gather information (including through a Kindergarten Entry Profile) about children’s learning and development from children’s families, early childhood programs, and kindergarten teachers. Individualized Learning Plans could be developed in kindergarten to address development and learning needs and support each student’s progress toward third grade reading proficiency and other learning goals. (See pages 56-57)

Improving Skills of Educators (p. 65)

We were pleased to see that RIDE staff continues to be responsible for the design of training and support for educators to meet the needs of children with disabilities, English learners, students who are gifted and talented, and students with low literacy levels.

Recommendation: We recommend highlighting strategies that support educators in PK-Grade 3 to achieve the third grade reading goal, including identifying children with developmental delays and disabilities as early as possible and providing IDEA services within high-quality early childhood programs, supporting dual language learners by offering bilingual instruction in the early grades, and integrating evidence-based

practices into daily instruction as early as possible for children who are struggling with reading. (See page 65)

Student-Centered Learning

We were pleased to see the strong focus on student-centered learning and connections made between student-centered learning and college and career readiness. In particular, we were pleased to see:

- *Student-Centered Learning Experiences* included as one of the “five categories inherent to a well-rounded education.”
- *A Post-Secondary Success indicator* that will measure students’ success in demonstrating achievements beyond those needed to earn a high school diploma, including Career and Technical Education industry-approved credentials, college credits obtained through dual or concurrent enrollment, successful completion of Advancement Placement tests as well as, starting with the Class of 2021, a Seal of Biliteracy or Pathway Endorsement.
- *School Redesign Models that include* small schools of choice that emphasize “student-centered personalized learning programs and relationships between students and adults, a rigorous and well-defined instructional program, long instructional blocks that promote interdisciplinary work, and a focus on post-secondary preparation” as one of the proposed School Redesign Models for schools identified for comprehensive intervention and support.
- *School Improvement Innovation Grants* designed to support innovative strategies to improve student achievement at low-performing schools with strategic priorities for funding including “increasing student access to pathways and learning opportunities that prepare students for college and career success” and “proficiency-based student-centered learning strategies.”

Recommendation: We recommend that additional measures of student-centered learning experiences be included on report cards, including whether the school participates in the Advanced Coursework Network and the percentage of middle and high school students participating in the Advanced Coursework Network. As the Individual Learning Plans (ILP) become more useful and regularly implemented, we also recommend identifying a measure of ILP usage and/or quality to incentivize schools to use this tool as it is intended, to support personalization. (See page 56)

Recommendation: We were pleased to see strong statements about the importance of social and emotional learning and wellness and school climate and culture throughout the plan. Rhode Island’s participation in the Collaborative States Initiative of the Collaborative for Academic, Social, and Emotional Learning (CASEL), the re-launch of SurveyWorks, and the focus on using data to track improvements in school climate represent a strong start. However, we would recommend stronger language in the plan regarding the inclusion of school climate data on state, district, and school report cards and the use of such data to drive school improvement plans. We also recommend that resources for improving school climate should be included in the School Improvement Resource Hub. Without a healthy school climate and strong teacher-student relationships, we cannot have true student-centered learning, nor can we expect improvements in achievement, graduation, or college and career readiness. (See pages 11, 32, 39, and 43)

English Learners (p. 67-70)

We support the plan to adopt a progress model that takes into account starting language proficiency level (and eventually other factors, such as grade). We also encourage the state to address ongoing concerns expressed by advocates for English learners and provide Spanish translations of as many assessments as possible, including the state's math assessment and science assessment, and to work with the College Board and other states to develop a translated version of the PSAT and SAT.

Recommendation: We recommend RIDE develop guidance, tools, and resources for LEAs to provide instructional support to young English language learners starting at age three as part of the state strategy to achieve the third grade reading goal. Research has shown that language acquisition is most effective and efficient during the early childhood years, between birth and age 8, with the youngest children learning faster and easier. Data from the 2015-2016 school year show that there were 1,085 kindergarteners, 1,120 first graders, and 1,190 second graders receiving English language learning support, but only 53 English language learners receiving services in preschool. LEAs could partner with community-based organizations serving preschoolers to identify and provide high-quality support for English learners starting at age 3 (or before) using a strategy similar to the itinerant early childhood special education model. (See pages 68-70)

Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk (p. 59-61)

We are very pleased to see Title I, Part: D addressing the specific needs of vulnerable children and youth who are neglected, delinquent, or at-risk. We are in strong support of ongoing communication and information sharing specifically outlined on page 56 of the state plan, between RIDE and DCYF in order to ensure students are able to remain in their school of origin when it is in their best interest.

We are encouraged to see mention of the shared responsibility between LEAs and the juvenile corrections facility to ensure students stay on track with their educational program during and after incarceration. In addition, we are pleased to see the state plan specifically identify coordination between the Rhode Island Training School and professionals from the student's school of origin as a critical collaboration in order to address timely enrollment upon release and participation in credit-bearing coursework to ensure a path to graduation.

We support RIDE in making the Advanced Course Network available to students who are attending the Rhode Island Training School in an effort for students to maintain coursework during incarceration as a means to earning high school credit during transition to and from their school of origin.

We are pleased with the recognition of youth offenders age 20 or under within the adult corrections population and the importance of access to quality adult education and coursework toward earning a General Equivalency Diploma.

Recommendation: We recommend that RIDE create a subcategory on p. 59 titled Child Welfare to reinforce the specific protections and requirements within the *Every Student Succeeds Act (ESSA)* for youth involved in the child welfare system including:

- RIDE, DCYF and LEA will ensure students involved in the child welfare system remain in their school of origin if it is in the student's best interest.

- RIDE and DCYF will identify a plan for providing cost-effective transportation in order to accommodate students in their school of origin.
- RIDE will identify a specific point of contact - other than the *McKinney-Vento Act* Coordinator - to facilitate efficient communication with DCYF, oversee rights and protections of students involved in the child welfare system and ensure implementation of best practices for this population at the local level.
- LEA will identify a point of contact focused on the education of children in the child welfare system who can aid in efficient communication and implementation of regulations, and support student transitions between schools when in the best interest of the student.
- RIDE and DCYF will share, track, and report confidential data on student achievement and graduations rates for students in the child welfare system and determine a method for sharing disaggregated data publically.

Recommendation: We recommend that RIDE publically share results of their analysis addressing reporting of progress of students involved in the juvenile justice system, findings from annual monitoring for compliance with state and federal education laws and regulations, data around vocational outcomes, number of students who have completed high school or earned a HS diploma, number of students with transition plans, and number of students who received their GED and credits earned toward GED, and outcomes of regular meetings with DCYF. (See pgs. 59-61)

Recommendation: We recommend that RIDE track and publically report data on the impact of the Advanced Course Network for students who are attending the Rhode Island Training School. (See pgs. 59-61)