Section	Code	Full comment	Recommendation	Change or response
Title I, Part A	assessments	DLM assessments: parents will need clarification	implementation guidance	Guidance and more information will be provided about the DLM assessments, administration, schedule, results, and reporting.
Title I, Part A	assessments	I wish we had end-of-course exams at the HS level. I wish we had a cut-score on something for a diploma to be awarded.	comment	End-of-course exams in high school are a local decision.
Title I, Part A	assessments	Proficiency: What is the proficiency level that will be used to measure HS Graduation Proficiency until 2021? How will this level be determined?	implementation guidance	The measures and levels of proficiency will be those approved for the Commissioner's Seal. A description of the process, assessments, and proficiency levels are found on the RIDE website. http://www.ride.ri.gov/StudentsFamilies/RIPublicSchools/DiplomaSystem.aspx#1254173-council-designations
Title I, Part A	assessments in other languages	I feel that language populations should be examined by schools or at least by district. Many families who require English as a Second Language services may cluster in a single district or even school neighborhood. Of course, when examined in relationship to the entire state, it is difficult to reach the 5% benchmark. It does not mean that the needs of these families should not be met.	implementation guidance	The recommended threshold is calculated at the state level (total population) since regardless of district or school of residence, the total number statewide would be the same. The cost for the translation is the same whether the language group is above or below the threshold.
Title I, Part A	assessments in other languages	I see an indication of intent to provide Spanish language access for assessments.	comment	Rhode Island will provide a Spanish translation of the mathematics assessment in grades three through eight beginning spring 2018.
Title I, Part A	assessments in other languages	PPSD has the largest English learner (EL) population in the state. We see this population of students as an asset to our district. The development of proficiency targets based on individual growth goals for students is a welcome addition. However, we are concerned that by not offering the PSAT and SAT in many students' native languages we are creating an unnecessary disadvantage.	implementation guidance	PSAT and SAT language translation is under College Board's purview. RIDE will continue to encourage them to translate math into Spanish.
Title I, Part A	assessments in other languages	We also advocate assessments being offered in more languages…	implementation guidance	Offering additional languages would mean requiring the translation of all new items in each language every year, which is cost prohibitive.
Title I, Part A	assessments in other languages	Ensure Spanish translation of Math of SAT.	implementation guidance	PSAT and SAT language translation is under College Board's purview. RIDE will continue to encourage them to translate math into Spanish.
Title I, Part A	assessments in other languages	The 5% OCR threshold applied statewide should be considered at an LEA level particularly as it pertains to accountability. If students are not given the opportunity to take a math test in the language they know best and are forced to take it in English, their performance may not be representative of what they truly know. And the higher the percentage of students within an LEA who speak a language other than English and Spanish, the more of an impact it will have on the validity of the results that are used to hold the school and district accountable.	implementation guidance	Accommodations (e.g., word-to-word dictionary) are available for certain state assessments for students who are English learners and who are required to take that state assessment.
Title I, Part A	assessments in other languages	The State should set aside funding for ad-hoc strategic allocation of Native Language Assessments for particular LEAs and schools. For example, a school with a concentration of a particular non-English speaking group other than Spanish that is not reflected in the entire state's numbers may benefit from this type of resource allocation. For example, Khmer is the 3rd most prevalent native language in the Providence School District.	implementation guidance	State funding is not sufficient to translate the new items for the assessment into every non-English language in the state on a yearly basis.
Title I, Part A	assessments in other languages	While some additional languages might not exceed the 5%, when all these additional languages are taken as a whole, a district may have a large enough population of students not speaking English or Spanish that it would impact the results of the state assessment because there are no language supports for them (for students not waived for being in the U.S. for less than one year).	implementation guidance	Accommodations (e.g., word-to-word dictionary) are available for certain state assessments for students who are English learners and who are required to take that state assessment.
Title I, Part A	English Learners	We are also concerned that our EL students are lumped together in one category throughout the plan. We encourage RIDE to take into account our students who are dual-identified as special education and EL, and our students with limited and formal education (SLIFE) as it sets baseline goals for individual student growth.	implementation guidance	When developing Individual Learning Plans, students' identifications, history, growth, and SLIFE should be taken into consideration and the appropriate supports provided at the local level.
Title I, Part A	English Learners	We also advocate … more time before EL's are asked to take the state assessment.	implementation guidance	Federal law does not allow more than one year for students new to the country and only in English Language Arts.
Title I, Part A	English Learners	Overall, while the proposed plan makes strides toward addressing the needs of EL's, it does not take into consideration the diverse needs of the population.	comment	This ESSA State Plan is a high-level document that sets forth overall goals as required by Federal law.
Title I, Part A	general	I do not see a clear path to reimagining schooling.	comment	This ESSA State Plan is a high-level document that sets forth overall goals as required by Federal law. The Companion Guide provides a stronger narrative and strategic background for many of the decisions and goals we have made as a state.

Title I, Part A	indicators	I don't see DRA2 anywhere for early education schools. Is that eliminated for accountability (I hope so!).	implementation guidance	DRA is no longer part of the accountability system.
Title I, Part A	academic proficiency index	Academic Proficiency Index (p.12-13) - We would like to request clarification on the denominator and how the participation rate is being used as the denominator - this language is not clear: "When calculating the Academic Proficiency Index the denominator will be the greater of 95% of all students - or when disaggregating data 95% of all students in the subgroup - and the number of students participating in the assessments."	clarification in plan	Changed "and" to "or" for the sentence quoted in the plan document.
Title I, Part A	academic proficiency index	With no state opt-out procedure we will have schools where rates may fall below 95% for parental opt-out but it appears that these tests would not be excluded from the denominator. So does this mean that if a school has a 93% participation rate, their index score will be calculated using a 95% denominator?	implementation guidance	Yes; 95% of all students is the minimum baseline. If more than 95% of all students (or students in a subgroup) are tested, then that number is larger than 95% and will be the denominator. If fewer than 95% of all students (or students in a subgroup), are tested, then the minimum denominator is the 95%.
Title I, Part A	academic proficiency index	We are unclear why two years of data will be combined for the calculation – would this potentially hurt a school that may have a fluctuation in their performance for one year (like a change in the population due to added grade levels or new programs for special populations, or influx of refugees, issue with building conditions, change in leadership)? Would this make it more difficult for identified schools to demonstrate improvement (or mask improvement) and would it impact ability to exit from status? Making year-to-year comparisons may also be a little tricky since you're comparing two years of data where one of those years overlaps.	implementation guidance	Guidance will be provided on this calculation prior to its implementation.
Title I, Part A	academic proficiency index	PSAT is named but then it doesn't get associated with any of the accountability metrics. How is this data going to be used? High school growth?	implementation guidance	More detailed guidance will be provided in a separate document.
Title I, Part A	academic proficiency index	The 95% participation threshold is high for a test of this nature and at the high school level.	comment	The 95% participation threshold is set by Federal law.
Title I, Part A	charter	I'm also concerned that Charter Renewal is not fully baked in here. That's a miss, I think. That this is sequenced is understandable, but frustrating. I get it....	implementation guidance	A detailed plan for charter renewal process will be provided in future guidance.
Title I, Part A	chronic absence	City Year supports the State's thoughtful inclusion of chronic absenteeism in the accountability system. Our experience has shown that chronic absenteeism is an important early warning indicator and by measuring and holding schools and accountable for making progress on this measure the state will not only shine a light on an important early warning indicator, but also set the stage for a more holistic approach to education.	comment	Thank you.
Title I, Part A	chronic absence	The calculation (p.18) says 10% or more of school days - would that be 18 or 10% of days enrolled? And how many days enrolled must a student be before they are included in the calculation?	clarification in plan	For student chronic absence, it is 10% or more of school days enrolled. We have clarified the plan accordingly.
Title I, Part A	chronic absence	Equity definitions – Chronically Absent Teachers – what absences will be included in the chronic absence calculation (for example, will professional development days, long-term leave, etc.)? How many days must a teacher been employed to be counted? Will it be set at 18 days regardless of how long they've been employed? Will there be guidance/support provided from RIDE to districts on how to combat staff absenteeism?	implementation guidance	In addition to clarification in the plan about professional development days and long-term excused absences being excepted, more information will br provided in the future about how this will be calculated and its parameters.
Title I, Part A	chronic absence	We are also concerned about what constitutes teachers' chronic absence, whether long term illness and/or leaves such as maternity/parental leave will count towards "chronic absence" and what assurances there are that schools / districts / individuals will not be penalized for absences related to professional work / professional development. Important professional development and/or professional work sometimes requires teachers to be absent from school and we are concerned about the possibly chilling effect of this provision on professional learning.	implementation guidance	In addition to clarification in the plan about professional development days and long-term excused absences being excepted, more information will br provided in the future about how this will be calculated and its parameters.
Title I, Part A	chronic absence	What constitutes teachers' chronic absence? What assurances are there that schools / districts / individuals will not be penalized for absences related to professional work / professional development? I am particularly concerned about the impact on professional development that requires teachers & administrators to be absent from school and am also concerned about whether long term illness and/or leaves such as maternity / parental leave will be counted as "chronic absence".	clarification in plan	This calculation doesn't include professional development days or long-term excused absences. We have clarified the plan accordingly.
Title I, Part A	classification	Annual Meaningful Differentiation" The system as proposed, continues to heavily weight test scores as the key indicator for the star system. This is a missed opportunity as we have discussed many times in the meeting, the law only requires test to account for 51% of the rating system.	implementation guidance	The data used for the accountability system needs to meet certain standards for quality, reliability, and validity. At this point, assessments are one of the few sources we have for that type of high quality, reliable, and valid data. As additional data are collected that meet these standards, there may be the possibility to incorporate them into the accountability system.
Title I, Part A	classification	'School Performance Descriptor" The words 'proficiency' and 'growth' should include the qualifier that it is proficiency or growth as measured by the state standardized test. I think it's misleading to say 'proficiency' or 'growth' when what is really meant is proficiency or growth as measured by the standardized test.	comment	Thank you for your comment.

Title I, Part A	classification	A five star school (equivalent to Commended?) should include a site review. I think that every 4 star school should be eligible to apply to be a 5 star school. Then a team of professionals (not unlike a charter renewal visit) conduct visits that allow the data to come alive with stories. Perhaps the same is true of 1 star schools. Your data says 1 star, we came out and looked, and we validated it's 1 star. ...	comment	Thank you for your suggestion. This suggestion is similar to the previous Commissioner's Reviews, which required site visits for all schools reviewed to ascertain their rating and areas of improvement. RIDE capacity for this type of visits is limited, which is one reason why the Commissioner's Review process was discontinued. RIDE is considering a report card dashboard enhancement that would allow districts and/or schools to edit certain sections of the report cards to highlight their strengths, success stories, etc.
Title I, Part A	classification	While we appreciate the intent of having a Report Card in addition to the standard classification system, we are disappointed that many of the school climate indicators that are included in the Report Card were not counted as the allowable "non-academic indicators" in the classification system. We believe that school climate indicators are critical to understanding the health of a school and also believe that "what counts" is what gets addressed in any improvement plan. We are concerned that indicators not included in the classification system may be seen as informative, but also may not be given the same priority in school improvement planning.	clarification in plan	It compromises the intent of SurveyWorks to use it for accountability. The overall report card will have additional school climate and other indicators (including SurveyWorks data) which should be used to drive change just as strongly as the accountability indicators.
Title I, Part A	classification	In regards to the new school classification star rating (ESEA section 1111(c)(4)(C)), I would love to see the incorporation of student feedback from the SurveyWorks student survey on school climate and student / teacher relations factored into a schools rating. If RIDE is going to continue (as I think they should) collecting student feedback in the form of SurveyWorks student survey, it is important that their experience be factored into school ratings along with their academic performance.	clarification in plan	It compromises the intent of SurveyWorks to use it for accountability. The overall report card will have additional school climate and other indicators (including SurveyWorks data) which should be used to drive change just as strongly as the accountability indicators.
Title I, Part A	classification	adjust star rating system to reduce reliance on tests	comment	The data used for the accountability system needs to meet certain standards for quality, reliability, and validity. At this point, assessments are one of the few sources we have for that type of high quality, reliable, and valid data. As additional data are collected that meet these standards, there may be the possibility to incorporate them into the accountability system.
Title I, Part A	classification	revise words "proficiency" and "growth" to clarify that it is "as measured by standardized tests"	comment	The rules and descriptors indicate that growth and achievement are in the tested content areas.
Title I, Part A	classification	the star system of rating schools still heavily weights tests as the most important factor and it was clear from meetings and public comment that while it is "an" important factor, it's not the importance the system places on it	implementation guidance	The reliability and validity of assessment data make it appropriate for use in accountability. Additional data (e.g., SurveyWorks) can still be used to learn more about schools and to drive change.
Title I, Part A	classification	After reviewing this section of the RI ESSA Plan, I have the following concerns: While the plan states that the "Report Card", rather than the school classification is the primary means of communicating school success, I remain disappointed and concerned that more non-academic measures, particularly school climate indicators, were not included in the indexing system. I am concerned that many of the important school climate indicators are not counted in the indexing system and, therefore, will not be given the same priority as those indicators included in the classification system.	implementation guidance	The reliability and validity of assessment data make it appropriate for use in accountability. Additional data (e.g., SurveyWorks) can still be used to learn more about schools and to drive change, particularly in areas of school climate.
Title I, Part A	classification	...the "Star Rating Report Cards" for schools make no mention of Survey Works, ignoring it for other indicators (that, for the most part, are test scores). Truthfully, there is little to nothing in place to ensure that schools with poor climate and culture improve. Students could rightfully ask: "Why did you pick my brain once again, if you were going to do nothing with my answers about how it actually feels to sit in these classrooms?" But there are things that could be done. Survey Works results could certainly be included in the Star Rating, or noted as an Appendix to the school Report Cards....	implementation guidance	It compromises the intent of SurveyWorks to use it for accountability. The overall report card will have additional school climate and other indicators (including SurveyWorks data) which should be used to drive change just as strongly as the accountability indicators.
Title I, Part A	Community Advisory Boards	"Community Advisory Board" I like this section.	comment	Thank you.
Title I, Part A	Community Advisory Boards	I believe that businesses shouldn't have a say in the Community Advisory Board. I believe this because of the fear that businesses will use their power and influence to get their ideas past on what school should be. Which would shut out teachers, parents, and educators from getting what they want done to get done. I also believe that students should be included in this advisory board as we are the ones who this most directly affects and this will determine the rest of our lives.	clarification in plan	In the plan, added students to types of representatives that may be included on the Community Advisory Board.

Title I, Part A	Community Advisory Boards	..I would like to suggest that the Community Advisory Boards also include students at the high school level (there are a variety of community organizations in RI that support student voice and could assist in this area)...	clarification in plan	In the plan, added students to types of representatives that may be included on the Community Advisory Board.
Title I, Part A	Community Advisory Boards	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.	clarification in plan	In the plan, added community early childhood and after school/summer programs to the types of representatives that may be included on the Community Advisory Board.
Title I, Part A	data collection	"Rhode Island is collecting teacher attendance data for the first time during the 2016 -2017 school year" I just want to note that we have been told in the past that RIDE already collects too much data, so for example, it can't collect data on recess or compliance with the new recess law. Troubling to me that it has time to collect data on teacher absenteeism, but does not have time or resources to collect data on free play recess which has been proven to improve student outcomes.	comment	Recess is required by state law for all elementary schools. If there are cases where schools are not following the law, concerned community members should bring it to the school and district administrators' attention for correction.
Title I, Part A	English Language Proficiency	English language proficiency (p.10-11) – We are concerned that EL's are essentially tested twice and therefore contributing twice to the overall accountability score for an LEA, and that this will negatively impact urban LEAs who have a large population of ELs.	implementation guidance	These measurements are for two different things: one is for content knowledge, the other is for language acquisition. This is an opportunity for LEAs to show how well they support English learners.
Title I, Part A	English Language Proficiency	Progress in Achieving English Language Proficiency (ELP) Indicators (ESEA section 1111(c)(4)(B)), page 25-27 … "Each student's attainment target will be set at the scale score for composite proficiency level 5.0 at the grade level for the year they are expected to attain proficiency." How will this information be collected over time? Will the information need to be imported into RIDE EL Census? At what intervals will this information be expected to be imported into a data system? How will this information be shared between districts when a student transfers to or from districts within the SEA/RI?	implementation guidance	Guidance will be provided that describes the process for ELP collection, reporting, and transfer between districts.
Title I, Part A	English Language Proficiency	Progress in Achieving English Language Proficiency (ELP) Indicators (ESEA section 1111(c)(4)(B)), page 25-27 … Acknowledging that students experience non-linear growth year to year (pg. 21), the target is reset each year but is the number of years to exit adjusted?	implementation guidance	The number of years to exit is not adjusted or else the exit year criteria becomes meaningless and there is no urgency to support the student in acquiring English.
Title I, Part A	English Language Proficiency	It is stated that a student should be at a composite prof. level of 5.0—associated with success on ELA assessment (pg. 25). The adjustments do not align with the progression timeline of 3-6 years, or Newcomers taking PARCC (RICAS) in year 2. This reflects the fact that performance on the state assessment is positively correlated with the academic English Language Proficiency of the student – and therefore measures their language ability more than ELA/math. The issue above will impact the identification of schools as TSI-LPS (pg. 37) How does this take into account a student who arrives in high school, for example in 11th grade? If a newcomer arrives in high school, are they allowed to stay? We know they could graduate in 6 years but will ACCESS have targets set out that far? Which grade levels will be used for ACCESS calculations? Grades K-12 take ACCESS but for a growth target not all grades make sense. What about ELs who have a target set, but then are identified as EL + Special Education – how will that factor into their target?	implementation guidance	Additional guidance will be provided on setting targets for English learners.
Title I, Part A	English Learners	(Subsection c) clarity on how this is a departure from monitored year 1 and 2 to include data up to 4 years following exit. This being included in the EL subgroup – will the data of former ELs be computed with current ELs (as one group) or simply reported out as former ELs to compare with current ELs (as two distinct groups)?	implementation guidance	Clarification will be provided in future guidance on how subgroup data is included during monitoring while in the program and after exiting program.
Title I, Part A	English learners	(Subsection d) Suggesting that one year waiver on ELA participation for a non-native English speaker allows for a minimum amount of time to acquire the English language and take a test in English is inconsistent with research.	implementation guidance	Federal law does not allow more than one year for students new to the country and only in English Language Arts.
Title I, Part A	English Learners	EL students with an ACCESS score of 3.0 or less, or who have been in the country for 3 years or less should be waived from having their RICAS count towards accountability as this may not be an accurate reflection of the instruction students may be receiving at the school (they're working on acquiring the English Language while learning content but not at the same 'pace'). They could still take the exam but their English Language Proficiency should be taken into account as the results may not be a true representation of the student's knowledge in ELA and math.	implementation guidance	Research shows that students need content as well as language acquisition, else students are stuck in a meaningless feedback loop. Accommodations (e.g., word-to-word dictionary) are available for certain state assessments for students who are English learners.
Title I, Part A	general	Having the structure of activating the collective responsibility for continuous improvement at all levels of education is essential for a well-rounded education our students need. Clear and transparent school classifications and a well-designed report cards will provide a clear picture for all stakeholders. These will serve as guide to effectively respond and take part in addressing the needs.	comment	We agree.
Title I, Part A	graduation rate	The composite graduation rate (p.15) works but what is the benefit of a 33% split vs. a 50/25/25? (and considering the language in the goal area just calling out a 4 year rate which suggests that graduating in four years is more valued).	clarification in plan	The benefit of the one-third split is that the emphasis is on the end goal, not the time it took to get there: students being ready for life after graduation.
Title I, Part A	graduation rate	Graduation (p.9-10) – We do not find language about 5 or 6-year graduation rates until later in the metric section. Should it also be mentioned here? The Appendix A charts are based on a 4-year rate. The language appears incongruent.	add to companion guide; also implementation guidance	For the long-term goal, we are federally required to set a 4-year goal. We will include 5-6 year goals (95%) in the Companion Guide.

Title I, Part A	graduation rate	Graduation – 12.5% yearly annual decrease amongst subgroups is high and has not been demonstrated in the past so what has changed that would logically lead us to believe we can expect these large gains.	comment	Thank you for your comment.
Title I, Part A	graduation rate	Lastly, we appreciate that RIDE will consider the 4, 5, and 6 year graduation rates for students. This will allow schools with large numbers of students with limited formal education and special education needs to individualize services, as opposed to focusing primarily on moving students through high school in four years. However, where schools have large populations of students with significant cognitive disabilities and students with limited formal education, we are concerned that even the current calculations will not take into consideration the amount of time and support all students may need. We ask that RIDE analyze individual schools with such populations to determine if the current metrics will provide an accurate reflection of the progress and preparedness of the specific student population for post-secondary success.	comment	Students' Individual Learning Plans should take these factors into account at the local level. RIDE will report out on the graduation rates for the subgroups required by Federal and state law.
Title I, Part A	high school growth	SAT SGP (p.23) – Determining an SGP for SAT is not how the test is generally viewed. College Board has vertically scaled the PSAT and SAT so we can view how students have improved from year to year. It is possible to have an SGP and the CB metric – would be useful to compare both or provide both to LEAs.	implementation guidance	Students and schools will receive both students' SGP score and the College Board scale scores.
Title I, Part A	high school growth	SAT SGP (p.23) –... The link for the SGP didn't work.	clarification in plan	The link will be fixed in the state plan.
Title I, Part A	indicators	The indicators for accountability are very clear.	comment	Thank you.
Title I, Part A	indicators	I would like to see RIDE embrace a more holistic view of how to respond when students are not achieving. The measures of chronic absenteeism and suspension are a start. What other questions do we need to be asking.	comment	The overall report card will have school climate and other indicators (including SurveyWorks data) which should be used to drive change just as strongly as the accountability indicators. Discussions about how to respond when students are not achieving should take place at the local level and be made by those closest to those students.
Title I, Part A	indicators	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.	comment	Thank you for your suggestion. Guidance will be made available for state prekindergarten programs about supporting this type of transition. LEAs are encouraged to collect this data to help inform their own instructional and curricular decisions.
Title I, Part A	innovation grants	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.	clarification in plan	An example was added to the plan relating to prekindergarten to grade three early learning program.
Title I, Part A	long-term goals	What supports are in place to ensure that the rigorous academic targets identified in this plan are achievable, especially by districts and schools with the hardest to serve populations?	implementation guidance	Guidance and best practices will be provided on this topic. Resources will be added to the School Improvement Resource Hub.
Title I, Part A	long-term goals	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.	implementation guidance	Guidance and best practices will be provided on this topic. Resources will be added to the School Improvement Resource Hub.
Title I, Part A	long-term goals	My concern is to make clear that the final document is in line with the RI Strategic Plan for Public Education: 2015-20 , which states up front (at page 5) that RIBE "has established a set of six overarching goals that formalize our commitment to excellence, expanded access, and seamless educational experiences," and that the first of those six goals is to "Strive toward academic excellence by setting standards that encourage all learners to achieve at the highest levels…." To be consistent with our Strategic Plan, I believe that the document should set goals both for proficiency and for excellence.	add to companion guide	The following goal will be added to the Companion Guide: by 2025, 20% of students score at the highest level of proficiency.
Title I, Part A	long-term goals	"In support of this and in line with Governor Gina Raimondo's Reading by Grade 3 plan, Rhode Island set its long -term goal at 75% of students attaining proficiency on the state assessments in English language arts and mathematics by 2025." As noted in the committee of practitioner meetings, this goal seems unrealistic given the broad range of growth required for different subgroups to get there, as noted in this section and in Appendix A.	comment	Thank you for your comment.
Title I, Part A	long-term goals	"Rhode Island will re-evaluate its goals after the first year of implementation of its new assessments to be implemented during the 2017 -2018 school year." This suggests to me that we are just kicking the can down the road now with the new test, which actually I think is fine since I think the goal is pie in the sky.	comment	Thank you for your comment.

Title I, Part A	long-term goals	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.	implementation guidance	Guidance will be made available for state prekindergarten programs about supporting this type of transition. LEAs are encouraged to collect this data to help inform their own instructional and curricular decisions.
Title I, Part A	long-term goals	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.	implementation guidance	Guidance and best practices will be provided for data collection, use, student services/supports, and other resources to support literacy.
Title I, Part A	long-term goals	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.	comment	Thank you for your comment.
Title I, Part A	long-term goals	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.	add to companion guide	The five- and six-year graduation rate goals will be added as state aspirations in companion document. Each will be 95% graduation rate since value those rates equally to the four-year rate.
Title I, Part A	long-term goals	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.	comment	Thank you for your suggestion. Setting goals for suspension reduction may put the focus on the results rather than the underlying causes, as the numbers may decrease due to alternate practices being used rather than root causes being resolved.
Title I, Part A	long-term goals	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.	implementation guidance	Guidance, tools, and resources will be shared on this topic.
Title I, Part A	long-term goals	In the 2017-18 school year new assessments (RICAS, PSAT and SAT) will be used for accountability. Given the need to set baselines on each of these assessments, we believe the 75% proficiency target for 2025 is an unrealistic accountability metric. Despite the acknowledgement that this metric will be reviewed, we believe that setting an unrealistic initial target for absolute proficiency sets districts like PPSD up for failure. And we believe this kind of accountability will reinforce negative stereotypes about schools and students based on one assessment. We appreciate the focus on growth in the plan, but feel that taken together growth and absolute metrics will cancel themselves out and keep a disproportionate number of schools in Providence in the bottom 5% - despite growth that may occur at our schools. We recommend that RIDE weigh growth more than absolute proficiency, and when the new baseline is established goals are then set with statistically valid metrics for absolute proficiency.	comment	Thank you for your comment.
Title I, Part A	long-term goals	important of quality early learning and development between birth and grade three	comment	We agree.
Title I, Part A	long-term goals	goal setting is unreachable (gaps too high) with not enough info or focus on "how" it could be achieved	comment	Thank you for your comment.
Title I, Part A	long-term goals	goals that are unrealistic are worrisome because we need to figure out a plan to get there	comment	Thank you for your comment.
Title I, Part A	long-term goals	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.	comment	Thank you for your suggestion.
Title I, Part A	classification	...the "Star Rating Report Cards" for schools make no mention of Survey Works, ignoring it for other indicators (that, for the most part, are test scores). Truthfully, there is little to nothing in place to ensure that schools with poor climate and culture improve. Students could rightfully ask: "Why did you pick my brain once again, if you were going to do nothing with my answers about how it actually feels to sit in these classrooms?" But there are things that could be done. Survey Works results could certainly be included in the Star Rating, or noted as an Appendix to the school Report Cards....	implementation guidance	It compromises the intent of SurveyWorks to use it for accountability. The overall report card will have additional school climate and other indicators (including SurveyWorks data) which should be used to drive change just as strongly as the accountability indicators.

Title I, Part A	report cards	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.	implementation guidance	All of the federally required elements will be on the first iteration of the report cards. Additional enhancements and indicators will be announced prior to future releases.
Title I, Part A	report cards	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.	clarification in plan	All of the federally required elements will be on the first iteration of the report cards. Additional enhancements and indicators will be announced prior to future releases.
Title I, Part A	indicators	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.	implementation guidance	The program office may consider inclusion of these indicators in future enhancements to the report cards.
Title I, Part A	report cards	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.	implementation guidance	The program office may consider inclusion of these indicators in future enhancements to the report cards.
Title I, Part A	report cards	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.	implementation guidance	The program office may consider inclusion of these indicators in future enhancements to the report cards.
Title I, Part A	report cards	Given the recent legislation that passed (every student counts), we may want to identify, not necessarily for accountability purposes, ethnic subgroups. Even if it is not reported to the USDOE, it would be useful to look at certain Southeast Asian groups. This is currently noted in section b (p 3) as 'not applicable'.	implementation guidance	This is a requirement by ESSA and will be on the report cards.
Title I, Part A	report cards	report card detail is missing and should be included	implementation guidance	All of the ESSA requirements will be included in the report cards.
Title I, Part A	report cards	include the report card data	implementation guidance	All of the ESSA requirements will be included in the report cards.
Title I, Part A	RIDE support for schools	Further, a focus on proficiency will only serve to increase the notion of 'teaching to the test' and placing too high an emphasis on tests and scores. The plan fails to outline how districts and individual schools and indeed, individual students are supposed to achieve these goals. With a focus on accountability instead of support, this plan essentially simply sets a bar, and perhaps that was the intent. For a year the Committee of Practitioners has heard from various groups about what the challenges are for different schools and districts. I regret that we do not, in this plan, have an outline of what kinds of supports RIDE will provide to move these goals toward any sort of reality. There are clear plans for schools in the bottom 5%, but this plan does not address how schools that aren't priority schools are supposed to meet these high goals. When I brought this up in the last meeting, I was told it wasn't RIDE's job to provide this support. I think this is a grave mistake and that the department's focus on holding schools and superintendents and districts accountable to standards, sets up an unhealthy and tone deaf tension. The administration could develop a feedforward loop which would enable districts, schools and teachers to clarify to the administration what challenges they face in achieving the goals set by the administration. The administration could then work in a support role sharing best practices and other professional support that could help a district achieve the goals set forth herein. This is a true missed opportunity and very disappointing.	comment	Thank you for your comment.
Title I, Part A	school improvement	Schools in Need of Support & Improvement / School Redesign: Concerned that the need to choose Redesign Models from a pre-determined list is similar to those under NCLB, although I appreciate the inclusion of a district/school choice option and the elimination of the "fire the principal / fire the teachers" mentality. Concerned about both the "Empowerment" Model and the utilization of Charter Management Organizations and other outside entities to "take over" a school. Concerned about timeline (2 years) for schools previously identified as "Priority". How many schools are currently in this category? What supports will be in place to identify needs, provide resources / technical assistance before a Redesign Model must be chosen. Will this be based on 2017-18 status or 2018-19 status? Concerned about funding for Redesign and allocation of 50% by formula and 50% by competitive process. How might a chronically low performing school be "competitive"? While I very much support efforts / requirements to "turn around" chronically low performing schools, I would like to see a process better articulated in this plan by which the conditions in the school as well as the full range of student needs that should be understood/addressed in order to raise student achievement are identified and technical assistance, resources etc based on "what works" provided as part of the "redesign / turnaround" effort. I do not see that type of analysis well articulated in the plan.	implementation guidance	Detailed information about this process will be provided in future guidance.

Title I, Part A	school improvement	City Year appreciates the State's approach to improving the lowest performing schools. By encouraging LEAs to leverage external partners and providing information on effective strategies through the School Improvement Resource Hub along with clear expectations for improvement, the State is giving school systems the tools they need to make meaningful improvements in struggling schools. City Year is particularly appreciative of the State's recognition of the important role partners play in effective, sustained improvement efforts. The organization has extensive experience providing additional capacity to our school partners by deploying full time AmeriCorps members, helping them to carry out evidence-based improvement strategies. Our experience indicates that it is critical that partners be included early and often in the redesign process and be held to the highest standards, including through frequent performance monitoring and accountability. The proposed School Improvement Resource Hub will be a valuable tool in assisting LEAs in their efforts to identify the right partners early on to make the needed improvements and ensure educational excellence for all students.	comment	Thank you.
Title I, Part A	school improvement	We are also concerned about the Redesign process and the Redesign Models, especially the inclusion of "Empowerment" and "Charter Management Organizations" in that list. We think that there should be more attention paid to the analysis and understanding of all factors that influence the health and success of a school, its students and teachers and a greater effort to provide technical assistance and resources to schools in need of support rather than requiring them to adopt a specific model or turn governance over to an outside entity.	comment	Thank you for your comment. One of the models is for an LEA to design its own redesign model for any of its schools that are identified as needing improvement. RIDE will provide appropriate guidance and technical assistance in this process.
Title I, Part A	school improvement	We are particularly concerned about the 2 year timeline for schools previously identified as Priority Schools, fearing that the aforementioned analysis and provision of appropriate support may not have been conducted and may not take place prior to having to select a Redesign Model. Additionally, we are concerned that allocating only 50% of School Improvement Funding by formula and 50% competitively may disadvantage these schools.	implementation guidance	Detailed information and guidance on the school improvement process, including funding through formula and competitive grants, will be provided.
Title I, Part A	school improvement	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.	implementation guidance	Resources for improving school climate will be added to the School Improvement Resource Hub.
Title I, Part A	school improvement	more clarity around autonomy	implementation guidance	Guidance will provide clarification on empowerment vs. autonomy.
Title I, Part A	school improvement	I appreciate the School Improvement Resource Hub as well as the flexibility that LEA's have in selecting their Community Advisory Boards.	comment	Thank you.
Title I, Part A	school improvement	I must confess that it was a test of my patience and perseverance to skim, scan, read, and understand what is being said in this section. This approach will only serve to further enhance and entrench school administrators at local and state levels. More regulations, rules, procedures, trainings, reports, review of reports, monitoring of indicators, data reporting, storage, accessing, and interpretation -- for the most part planned, organized, implemented, and evaluated by the same people and processes currently in place. Quite simply, empower community and business entities and leaders, parents, teachers and direct service personnel, and provide students with a seat at the table and a voice. Allow and trust the stakeholders with the most to gain or lose with responsibility and authority to participate directly in decision making that affects all concerned, the students most of all. Professionals can provide information, research alternatives, help to schedule and coordinate group and school decision making activities and functions. The State can likewise offer advice and assistance at all levels of building a democratic process where all stakeholders have a voice and say-so. Many people who might choose to participate voluntarily in school decision making when they discover that their voice and opinions carry little if any weight. Decisions are made by administrators who oftentimes choose to substitute their own judgments for those expressed by the will or consensus of the people that administration is appointed to serve. Trust the people closest to the students to act in the students, families, and communities best interest.	comment	Thank you for your comment.
Title I, Part A	school improvement	I also don't believe an option for the failure of schools improving to meet the improvements for subgroups by 2022-2023 school year being closure. This doesn't solve the problem as it most likely adds new stressors to students how now have to worry about where they're going to school and then will cause them to not be able to perform at their peak. What I believe should replace this is a comprehensive plan and curriculum that starts in 1st grade that promotes the desire for learning for all children.	implementation guidance	Detailed information and guidance on the school improvement process, including funding through formula and competitive grants, will be provided.
Title I, Part A	social emotional learning	City Year fully supports the efforts of the State to work toward developing standards for social-emotional learning (SEL). City Year has long incorporated social-emotional and school climate and culture supports into the services provided to schools because the organization recognizes that supporting students' social-emotional development can increase attendance and reduce disciplinary infractions. Effective SEL generates greater student empathy, leads to improved personal and community decision-making among students, improves student achievement, and increases the likelihood of other pro-social behaviors. Last year, 82% of students being coached on social-emotional competencies exhibited skills considered typical or strengths for their age group by the end of the year. The introduction of SEL standards will encourage schools to focus even more on this important set of skills for all students and City Year looks forward to collaborating with administrators and teachers to ensure all students receive the supports required to meet the standards.	comment	Thank you.
Title I, Part A	student growth	unclear how growth will be measured with transition to new test (especially in first year)	implementation guidance	Guidance will be provided on this calculation prior to its implementation.
Title I, Part A	student growth	growth in the number of students proficient vs. growth for each student should be clarified	comment	Thank you for your comment. Clarification will be provided on these elements.

Title I, Part A	student suspension	"The Student Suspension indicator will measure the number of out of school suspensions per 100 students Pre-Kindergarten through grade 12" As mentioned in the Committee of Practitioner meetings, I think that this is a an example of not addressing the issue. Suspensions don't cause drop outs – correlation is not causality. This will result in in-house suspensions or other punishments and not get to the root of the issue. Just because it can be measured doesn't make it meaningful and this measure is misguided.	comment	Thank you for your comment.
Title I, Part A	student suspension	Calculation (p.19) – will the denominator reflect changes in student enrollment – so a student who may have been present at school x for 60 days was suspended twice but that student is not enrolled at that school at the end of the year (they're at school y) – will the 60 days data be included in the school x calculation? And how many days enrolled at a school must a student be to be included in the denominator? How many days enrolled at the district level	implementation guidance	Details about this calculation will be provided in implementation guidance.
Title I, Part A	student suspension	Suspensions – Currently the only proposed metric to track suspensions is the suspension rate per 100 students, which is not an easily understandable metric (not as straightforward to interpret when planning for change). Another potential metric that may be easier to understand could be the percentage of students who have been suspended at least once.	implementation guidance	Guidance will provide further clarity about the rationale behind the "per 100 students" rate. In summary, this rate highlights the urgency of some of the cases where there are more suspensions per 100 students (e.g., 330 suspensions per 100 students) than a percentage would show.
Title I, Part A	student suspension	Suspensions – similar to chronic absence the national research shows that students of color, with disabilities and who are FRL are more likely to be suspended. Given the different demographic compositions of the urban vs. suburban schools, how will this be calculated in a way that takes our differences into consideration?	implementation guidance	Some LEAs have different demographics than others. LEAs and schools can review research and best practices to consider approaches that can support their efforts to reduce suspensions.
Title I, Part A	student suspension	unclear: suspensions (does it include in-house?); response: no, just out of school; answer: in that case, I have concerns	comment	Thank you for your comment.
Title I, Part A	early warning system	We also applaud the incorporation of an early warning system that looks at many key indicators from grades 6-12 to identify off track students. Our experience shows that early interventions to address the early warning indicators are crucial for student and school success. However, we have seen that effective implementation of an early warning system- one that couples consistent monitoring of data with aligned interventions – often requires additional capacity in school buildings. It may be wise for the state to articulate how it plans to leverage external partners to effectively implement those systems. Organizations leveraging full time national service members are able to offer the additional capacity to implement these systems cost-effectively.2 With this additional capacity, schools will be able to effectively implement the activities the state envisions and achieve educational excellence for all students.	implementation guidance	The School Improvement Resource Hub and other guidance will be shared about partnerships and opportunities for schools and LEAs.
Title I, Part A	foster students	1. Right to stay. The plan should be clear in asserting the right of children and youth in foster care, as stated in federal law and confirmed in ESSA, to stay in their district of origin when entering care. This does not seem to appear in the plan as proposed, and may require modification of state law.	implementation guidance	This is stated in the plan and required by state law. Further guidance will be provided.
Title I, Part A	foster students	2. Shared/Common Identifier. RIDE and DCYF should go further and call for and begin work on creation and utilization of a shared unique child identifier, and require LEA's to adopt its use as well. It is impossible to track academic progress of foster youth across placements without such, and this in turn hinders any accountability within the system to address youths' academic needs. A shared identifier is also necessary to ensure that the accountability measures in ESSA can be accurately assessed for the sub-population of youth in foster care, as not all schools are aware of all of their students who are in out-of-home care situations.	implementation guidance	This is part of the workplan in the current draft of the MOU between DCYF and RIDE for data sharing so can verify that students who are enrolled are in care.
Title I, Part A	foster students	3. Rapid/Immediate intake. Schools must be held to a standard for rapid/immediate enrollment. Both the liaisons and the MOU will help with this need. We recommend requiring that data be maintained by LEA's on the date of referral and entry, and that targets be set for immediate intake. The ultimate goal might be within two school days of entering the community, but without a baseline of where communities are now and ongoing data sharing, it will be hard to measure progress. Also, in those cases where a child must change schools, enrollment should be allowed immediately, without regard to records, documentation, etc. The window of opportunity is very narrow for a youth newly-placed. Currently, youth often experience a delay of several weeks before continuing class. This can frequently result in failing that academic quarter, which can easily cascade to a failed year, and in many cases, dropping out of school entirely. Clearly, DCYF needs to be able to inform the SEA/LEA immediately in the event of a placement, and their needs to be an immediate requirement of response by the LEA/SEA for this to work.	implementation guidance	This already exists in state law: a state ID card ensures students are enrolled immediately. Further guidance will be provided.
Title I, Part A	foster students	4. Transportation. Transportation to and from school is a responsibility of the educational agency. All too often, a youth may be placed, even temporarily, a challenging distance from his/her school. If transportation supports for the youth are not immediately available, that directly correlates to the prospect of academic failure referenced in the previous bullet. Currently, many foster parents or group home providers end up transporting youth to and from school. In addition to the MOU, a funding mechanism needs to be created/affirmed for ensure that these costs are not shifted from one department to another or from schools/government departments to the community.	implementation guidance	RIDE and DCYF will review all current state laws and regulations for consistency with requirements in ESSA.
Title I, Part A	foster students	Not addressed in plan: 5. Students with Learning or Behavioral Health needs. Members had raised the concern of schools refusing to accept troubled youth with and without IEP's and 'creaming'/ only accepting students more likely to help schools achieve higher scores. The plan does not appear to address the issue of Schools/ LEAs need to accept all youth/ 'own' all youth from/residing in their districts.	comment	Thank you for your comment.

Title I, Part A	foster students	Not addressed in plan: 6. Normalcy Provisions. Youth at the listening sessions spoke eloquently for the need for access to extra-curricular and enrichment activities—clubs, teams, etc. The more readily they can learn of these services and supports, the greater the likelihood of their ability to utilize/ join them. Consideration should be given to ensuring the youth and his/her foster parent receive timely information about their availability.	implementation guidance	RIDE and DCYF will review all current state laws and regulations for consistency with requirements in ESSA.
Title I, Part A	foster students	Not addressed in plan: 7. Sensitivity/ Consideration. Youth also spoke to the fact that few, if any, teachers would be aware of their situation in foster care. While ensuring confidential information is critical, several youth felt that teachers would benefit from that knowledge, in order to better prepare lessons.	implementation guidance	Guidance and resources will be shared for school and LEA staff on sensitivity and consideration of foster status.
Title I, Part A	foster students	Not addressed in plan: 8. Access to vocational education. Youth spoke to their need for vocationally-oriented educational programming that could prepare them for meaningful trades and positions outside the stream of college-oriented courses.	comment	Thank you for your comment. Guidance and resources to support this will be provided to LEAs and schools.
Title I, Part A	foster students	Not addressed in plan: 9. Consistent Academic Guidance. Given that youths' academics can be fragmented and inconsistent, it is critical to have consistent educational mentoring, perhaps in the purview of RIDE, to ensure that youth are taking the correct classes and have met the necessary milestones both to graduate and to apply for and move on to college.	comment	Thank you for your comment. The students' Individual Learning Plans should direct students' academic next steps.
Title I, Part A	teacher recruitment	City Year appreciates the thoughtful approach the State has taken to gather feedback on determining the best way to support the attraction and development of a diverse cohort of teachers to serve Rhode Island's most challenged schools. Along with the State, City Year recognizes the challenges facing Rhode Island's high-poverty, high-minority schools, and the importance of developing novel methods for improving the conditions for educator success in these districts. 80% of partner teachers agree that their AmeriCorps member helps them differentiate instruction, and 90% agree that City Year members provide essential academic services students would not otherwise receive. City Year believes that the State's approach toward a talent management system to address these focus areas is a great tool to better address this issue. City Year's experience has shown that one of the best ways to support teacher success is by helping to provide them with additional supports and capacity that can improve the environment that they operate within. We believe that non-profit, evidence based partners can ultimately play an important role in supporting Rhode Island's teachers by improving conditions for learning and providing additional support in the classroom. City Year alumni represent a diverse array of backgrounds, and bring with them the cultural competency skills necessary to help teachers thrive in these challenging environments. In fact, ultimately over one in four City Year Providence AmeriCorps members go on to become teachers, with close to two thirds remaining in state. We would welcome the opportunity to work with the state to further work on identifying opportunities for non-profit partners to support the work of Rhode Island's teachers and to create innovative pathways into the teaching profession.	comment	Thank you.
Title I, Part A	BEP	As a Library Media Specialist who has seen changes in how Library services has been diminished from the original and well received 'BEP' (Library Media Specialists in each school dependent upon student population, especially in the Jr High and High School) I was under the impression that Administrators no longer had to adhere to the BEP. The BEP was favorable to the Library Media Specialists and the students who benefited from having consistent access to school libraries, without them shutting their doors. I am just questioning how the BEP is still being used in ESSA? If so, then will you issue a public statement that states that the BEP is alive and well, and still should be adhered to if you consider it your 'guidepost' and its contents are important enough to be used in the current ESSA for RI? The BEP was our 'guidepost' in the Library Media Specialist' area: one Library Media Specialist for each 500 students, in any school setting (not just High School). Some RI districts are not adhering to this policy. If the BEP is going to be referenced in ESSA, than I feel we should be able to use its 'guideposts' in the real world as well.Your comments on this would be greatly appreciated. Thank you. REGARDING THIS ESSA SECTION: page 54 & 55: With the BEP and the Strategic Plan as guidepost, RIDE is implementing several strategies to address health and safety: ⬛ RIDE is currently in the process of developing standards for social emotional learning (SEL), (http://www.ride.ri.gov/StudentsFamilies/HealthSafety/SocialEmotionalLearning.aspx). Rhode Island has joined the Collaborative States Initiative of the Collaborative for Academic, Social, and Emotional Learning (CASEL) to support the 55 development and implementation of these standards. A portion of two state agency salaries is used to support the internal organization of this work in developing SEL standards or grade level expectations. Rhode Island districts and schools will be able to use the new expectations to align and organize programs to reduce incidences of bullying and harassment, and reduce the need for and use of all discipline practices, including those which remove students from class and those that compromise student health and safety.	comment	Thank you for your comment. The BEP is still Rhode Island regulation for education and should be followed. Concerned stakeholders should address their concerns about local BEP adherence with their local school and district administration and school committee to resolve any issues in implementation.
Title I, Part A	culture/climate	...in answer to School Conditions on page 55 (ESEA section 1111(g)(1)(C)): (Describe how the SEA agency will support LEAs receiving assistance under Title I, Part A to improve school conditions for student learning), the bullet point about Survey Works seems to imply that just administering the survey and passively posting results is enough. But how would that actually cause improvement in culture and climate? The reality is that the survey results have not been widely publicized and most people are not aware of them. What is in place to ensure schools make this a priority...	comment	Thank you for your comment. RIDE has built tools into the SurveyWorks platform that schools and communities can use to help them analyze the data and inform their decisions

Title I, Part A	culture/climate	Superintendents could be required to meet with all school principals to review the Survey Works data, with every school addressing ways to improve Climate and Culture as part of its School Improvement Plans—since most schools in RI were still far below the national distribution of responses, it is fair to argue that every RI school should have a plan for improving its climate and culture. In keeping with the goals of empowerment, schools would not be told how to improve their climate, although materials with ideas could be provided for schools to use. I hope these suggestions will be taken into consideration and added to the response on page 55 of the ESSA plan, as well as in mentions of "School Quality" on page 28 of the plan	comment	Thank you for your comment. RIDE has built tools into the SurveyWorks platform that schools and communities can use to help them analyze the data and inform their decisions
Title I, Part A	DCYF MOU	I am mostly concerned with Part 7, School Transitions portion of this section. The Memorandum between RIDE and DCYF is not solidified as of this date so it is difficult to comment directly. I would hope the Memorandum would provide clarity on how "best interest of the student" will be defined and what entity will be making the determination. Best scenario would be a team including parents/foster parents or Educational Advocates, school personnel, the student when appropriate as well as Child Welfare personnel making the decision. Assurances need to be made to avoid any conflicts of interests. How school stability will be defined for complicated students in DCYF care living in "out of state facilities" as well as students who attend "in-state out of district" school settings is also a concern when determining what LEA will be responsible for planning and finances. There is RIGL protecting school stability for typical students in typical settings for a current academic semester. Transportation has been the barrier to accomplish this and would need a specific plan in the Memorandum as well as determining if it would be in the student's best interest to continue beyond the current academic semester. Thank you.	implementation guidance	RIDE and DCYF will work together to provide appropriate guidance and resources.
Title I, Part A	student transitions	Adult education is not mentioned in the section on transitions. K-12 teacher training and LEA school culture should include an understanding of the RI adult education network. It is unlikely that we will ever reduce the drop out rate to 0, and students who are reaching transition age should know that they (or their peers) should not have fewer rights if they aren't graduating "on time" and that they will have opportunities to access to education in the future. Students should never be told: "if you don't graduate, you'll be nothing," but they often are.	add to companion guide	Language will be added to the Companion Guide about following students after graduation (e.g., adult education pathways).
Title I, Part A	teacher preparation	I believe that a part of the teacher recruitment and training process should involve some classes or seminars on child psychology and how children mentally work. This would help teachers make lessons that target their group of kids and make it stick in their heads the lessons that they have learned. I also believe that training should involve making a curriculum that supports and grows all students desire to learn.	comment	Thank you for your comment. Educator preparation programs must follow certain requirements in order to be approved by RIDE. You can find the program requirements and approvals here: http://www.ride.ri.gov/TeachersAdministrators/Educator Certification/RIEducatorPreparationPrograms.aspx
Title I, Part D	juvenile justice reports	LEAs do not have access to course progress data pertaining to students that are institutionalized. Therefore, RIDE should have this information available upon the request of an LEA in addition to having the aggregate state level data available as proposed in the section. This would provide accountability on behalf of local schools in making sure their students are on track with their ILP. This would be useful to Providence given that it most likely has one of the largest shares of students in correctional facilities from a particular LEA.	comment	Thank you for your comment.
Title I, Part D	DCYF MOU	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.	implementation guidance	RIDE and DCYF will work together to provide appropriate guidance and resources.
Title I, Part D	Homeless program section	The description of this section as it relates to DCYF is not fully accurate. We have provided specific edits to the Title I Part D Coordinator.	comment	Thank you for your comment.
Title I, Part D	juvenile justice reports	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.	comment	Thank you for your comment. We will look into this to determine if it is feasible.
Title I, Part D	juvenile justice reports	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.	implementation guidance	Indicators will be added and tracked during implementation.

Title I, Part D	prevention programs	It is more important and more effective in the long run to strengthen prevention programs in local schools in collaboration with community service agencies. Early intervention and prevention is a far more effective and less costly approach to assisting targeted population to socially acceptable and economically productive life styles. Early intervention and prevention yields superior results than does reintegration of students who have strayed so far from the norms that they need to be separated from the mainstream of society and given highly intense supervision and treatment to which they may not commit to participating in. Too much water under the bridge. We can do much more with early detection, intervention, prevention. It will require additional resources and funds to improve our prevention capacity. However, in the long run, it will cost far more in terms of loss of human potential and possible harm to others and/or society, to wait, do nothing, and then try to rehabilitate young people who have sometimes for years, strayed far from our mainstream democratic values and behaviors.	comment	Thank you for your comment.
Title II, Part A	professional development funding	If the primary goal is to use Title II funds to improve educator effectiveness, is there a budget for offering PD and how does the additional 3% of the funding set aside for professional development fit in? What would be the budget for a district? How does this align with the new secondary regulations requiring 15 hours of PD at the LEA level?	implementation guidance	Further detail will be provided to supplement the existing overview for use of these funds in the plan. The 3% funding is a state set-aside that will all be used to support leadership development and will be phased in over three years up to 3%.
Title II, Part A	RIDE support for schools	If districts/schools perform poorly on the publically reported educator effectiveness, licensure, or absenteeism indicators, how will districts be supported in improving these areas?	implementation guidance	Further detail and guidance will be provided; the School Improvement Resource Hub will share resources to help schools improve in a variety of areas.
Title II, Part A	RIDE support for schools	What is the intended impact/outcome of reporting these indicators publically?	comment	It is uncertain which "indicators" are being referred to in this comment. All indicators in this plan are Federally required to be reported.
Title II, Part A	RIDE support for schools	How will state level academic content specialists effectively support educators from various autonomous schools?	comment	Thank you for your comment. Many resources are and will be made available through the RIDE website, School Improvement Resource Hub, RIDEmap, etc.
Title II, Part A	certification	RIDE should establish a certification system for adult educators.	comment	Thank you for your comment.
Title II, Part A	Professional development	It is important to have high quality ongoing professional development connected to certification across ALL content areas included in a well rounded education.	comment	Thank you for your comment. This will be in effect for all certified areas with professional development becoming part of the certification process.
Title III, Part A, Subpart 1	English learners	(Page 67): The hyperlink to the exit criteria links to a memo from 2011, however on the RIDE.gov.ri website is a hyperlink to a memo from 2016 with updated exit criteria. Which is the correct exit criteria to link to in the ESSA document? 2016 memo located on RIDE's English Language Program's Entrance/Exit Criteria http://www.ride.ri.gov/Portals/0/Uploads/Documents/OSCAS/State%20Defined%20English%20Learner%20Exit%20Criteria.pdf	comment	Thank you for your comment. The first hyperlink (2011 document) is to entrance criteria. The exit criteria (2016 document) is linked later in the section.
Title III, Part A, Subpart 1	English learners	(ESEA section 3113(b)(2)), page 68: States "ACCESS for EL" assessment is used for exit criteria – Should this state "ACCESS for ELLs 2.0"? (it is listed as ACCESS for ELs 2.0 on page 25)	clarification in plan	Corrections made to the plan for reference consistency.
Title III, Part A, Subpart 1	English learners	Revision of exit criteria based on the new scaled scores. The scores were changed to reflect more rigorous standards. Would adjusting the revised exit criteria be in some sense "undoing" WIDA's changes?	comment	Thank you for your comment. This does not change WIDA's criteria.
Title III, Part A, Subpart 1	EL enrollment	In paragraph 1, it states that English learners are assessed for such status within 30 days of enrollment in a school and then in the fifth paragraph it states that the enrollment and placement process must be completed within 20 days of student enrollment. This would need clarification.	clarification in plan	This was a typo that has been corrected.
Title III, Part A, Subpart 1	EL entrance criteria	I am of the understanding that W-APT will no longer be the tool for intake. Instead, the tool for intake will be MODEL 2.0. Which is correct?	comment	Thank you for your comment. This is included in the plan and additional guidance will be provided for implementation.
Title III, Part A, Subpart 1	EL exit criteria	Not sure why a 6 year time frame was considered for becoming proficient in English. Various researchers have stated that a timeframe for proficiency is based on the student's level of L1 literacy, their prior formal schooling background and other factors, which are not mentioned in the documents. Also not sure why a 5.0 composite score was given as a proficiency score. Was this a recommendation from WIDA. If so, it should be stated as such.	comment	Thank you for your comment. Research supports a six-year timeline.

Title IV, Part A	allowable activities title IV(a)	Rhode Island Coalition of Library Advocates June 13, 2017 Dear Commissioner Wagner and ESSA Planning Team, I am writing as Chair of Rhode Island's Coalition of Library Advocates, a grassroots library support group that seeks to improve the quality of life for all Rhode Islanders. I behalf of COLA, we request that RIDE's Draft ESSA State plan be revised to incorporate grants in Title IV, Part A, to support increased student achievement with innovative programs and resources in school library media programs. RI's Basic Education Program (BEP) requires all schools and local education districts (LEA) to provide a high-quality education for all RI public school students K-12 and requires all schools to provide effective high-quality school library media programs with equitable access to school library media resources and instruction in information literacy standards (BEP Chapter 13, G-13-1.3.11) Unfortunately, the current draft RIDE Plan for ESSA funding does not identify innovative school library media programs for grant funding at a time when LEA's financial support for resources and instruction to enhance student learning in school libraries is decreasing. Effective school library media programs have school library media specialists who empower students to be critical thinkers, enthusiastic readers, skillful researchers, and ethical users of information and who ensures all students have equitable access to resources and receive instruction in information literacy with opportunities: 1. to read widely for lifelong learning; 2. to access, evaluate, use, and share new knowledge using a variety of information resources (print, visual, media, and digital); 3. to problem-solve using diverse sources, contexts, disciplines, and cultural perspectives; and 4. to use information ethically by respecting others' ideas and acknowledging their contributions. (RI BEP G-13-1.3.11) RIDE's ESSA plan should provide grants for School Library Media Activities in Title IV Part A: Student Support and Academic Enrichment Funds with "Activities for well-rounded educational opportunities" and "Activities for Effective Use of Technology." RIDE's plan should provide opportunities for grants for Title IV for LEAs to improve the use of technology with digital literacy instruction and activities in school libraries. The school library media specialist in each school can increase access to personalized, rigorous learning experiences supported by instruction in technology and providing equitable resources for all students including digital media information literacy skills. Thus, it is essential to ensure all students have equitable access to library media resources and instruction by a library media specialist. ESSA can provide innovative grant funding for creative library media programs. Please add School Library Media resources, activities, and programs to ESSA Title IV Part A to provide the stimulus for innovative grants to create new opportunities to increase student achievement and success. During these critical budget times, it is imperative that RIDE incorporate ESSA Title IV, A, grant funds for student success with access to resources in school libraries, instruction, and programs by certified school librarians with innovative activities to enhance learning. Thank you in advance for consideration of this request to add school library media programs to ESSA. Sincerely yours, Dr. Cheryl A. McCarthy, Chair RI Coalition of Library Advocates P.O. Box 3777, Cranston, RI 02910 ▼ cola.rhodeisland@gmail.com ▼ www.colari.ri	implementation guidance	The final list of allowable uses of the funds will be provided to LEAs with the complete application package.
Title IV, Part A	allowable activities title IV(a)	Community schools, such as the COZ should be listed as one of the options/strategies in this section.	comment	Thank you for your comment. The list is one of activities rather than programs.
Title IV, Part A	allowable activities title IV(a)	I suggest the list of topics in "well rounded" education mirror the list in ESSA. Specifically, health education is missing. Although there are topics related to safe and supportive environments in the section below, health and physical education are required topic areas. Determining HOW schools effectively integrate health and physical education is an important part of innovation and reimagining education. Good physical and behavioral health supports academic achievement.	comment	The final list of allowable uses of the funds will be provided to LEAs with the complete application package.
Title IV, Part B	21st CCLCs	● Is the contract with the United Way or United Way of Rhode Island? What is the timeline of the contract and is there the possibility of renewal?	clarification in plan	The name has been updated in the plan, and also noted that the contract is current, which leaves open possibility for other organizations in the future.
Title IV, Part B	21st CCLCs	● Is the strategic goal that of the Governor or should this read a Strategic Goal of the Rhode Island Children's Cabinet 2017-2020 Strategic Plan?	comment	Thank you for your comment. This is the Governor's goal.
Title IV, Part B	21st CCLC evaluation	The section that says contract with United Way for evaluation..... I don't think an agency (United Way) should be listed in the plan, because you may want to contract with an other organization in the future. I think it should say something like contract with a local organization to provide evaluation services,......	clarification in plan	Clarification in the plan to note that the contract is current which leaves open possibility for other organizations in the future.
Title IV, Part B	Use of funds	I am glad Title IV money can be accessed for a number of educational objectives. However awarding subgrants and outsourcing work as a way to address student needs is not the best use of money and resources. In my opinion, outsourcing is irresponsible and an easy way out. We should focus on action plans that develop programs, PD training, and empirical instruction in RI schools.This pattern of outsourcing needs to end. I think community programs are great but they should not be the primary plan for improving third graders' reading proficiency to 75 % by 2025.	comment	Thank you for your comment.
Appendix A	appendix A	The appendix does not clearly label which grade levels are represented.	clarification in plan	Addition of labels to Appendix A to show that data is grades 3-8 and high school ('all grades').
Appendix A	appendix A	SAT data is not included nor did I see it in the Establishment of long-term goals section in Part A, Q4.	implementation guidance	SAT data is not included as a long-term goal in this plan because there has only been one year of implementation.