

Enclosure 6a

September 16, 2016

SECONDARY REGULATIONS & THE RI DIPLOMA SYSTEM

September 20, 2016

Revision Timeline

- Nov. – Feb.: 22 role-alike groups met
- Feb. – Mar.: 4 community meetings held
- Feb., Mar., & Apr.: Council meeting discussions
- May: Council voted for public comment
- May – Jun.: Office of Regulatory Reform review
- Jul. 1st – Sept. 15th: Public comment period
- Oct. 11th: Scheduled Council vote

*Guidance Published by December 2016

Review of Previously Discussed Changes

<p>Extend the intensity of support for literacy skill acquisition to numeracy</p>	<p>Coursework requirements centered on demonstration of LEA-defined proficiency level aligned with high school standards</p>
<p>Maintain 20 course minimum requirement, with flexibility to meet through non-traditional learning experiences</p>	<p>Reduce the number of performance-based diploma assessments from two to one</p>
<p>Shift in state assessment as a statewide graduation requirement, to a Council Designation metric</p>	<p>Introduced Council Designations as an umbrella concept be further defined by the Council (as Commissioner's Seal and Pathway Endorsement)</p>
<p>Ensure students and parents are notified of graduation requirements by Oct. 1 of 9th grade year</p>	<p>Utilize ILP as central documentation of student goals, supports, and progress, in place of a multitude of "plans"</p>
<p>Expand allowable personalization strategies beyond the advisory structure for middle schools</p>	<p>Replace mandated monitoring with ensuring appropriate LEA documentation for audits, as determined by the Commissioner.</p>

Public Comment: Who did we hear from?

- **31 comments** submitted during the public comment period through letters, email, and public comment testimony
- **61 attendees** at public hearings, 16 of those gave comment
 - 32 educators or education-related professionals
 - 8 elected officials (including school committee members)
 - 6 parents
- **4 public hearings:**
 - August 22nd: Cumberland
 - August 29th: Newport
 - September 6th: Warwick
 - September 12th: Providence

Comments Mirrored Previous Themes

- The diploma system should be **accessible** for all students.

The Rhode Island English Learner Advisory Council gave their full support to the regulations.

- The diploma system should **validate** student learning and be **valuable** to students, parents, post-secondary institutions and employers.

Comments were evenly split about whether the state assessment should be a graduation requirement.

- Opportunity to learn both broadly and deeply should be **equitable**, to prepare for students for college and career.

Multiple comments in support of the balance of breadth and depth of curriculum, particularly around student support being equal in literacy and mathematics.

- Student learning should be **personalized**, so that all students are engaged and find joy in learning.

Many comments focused on the need for appropriate and uninterrupted support for all students in a personalized environment.

Recommendations Based on Comment

1. Reintroduce the definition of “advisory structures”
2. Consolidate redundant language regarding diplomas for students eligible for the alternate assessment
3. Clarify the need to include Council Designations on both student transcripts and diplomas
4. Clarify intent of alternate recognition of high school accomplishment section
5. Expand PD focus to include literacy and numeracy throughout the curriculum

Summary of Public Comment – Middle and High School Learning Environments and the Rhode Island Diploma System Regulations

Regulations Section	Summary of Comments	Change to Section	Suggested Change to Language or Rationale for No Change	Original Language
L-6-1.0: Definitions	The revised language removed a paragraph on middle level advisory requirements. While the term "Advisory Structures" appears in section L-6-4.0, "Advisory Structures" is not defined. It is recommended that this term be defined.	Change #1	“(b) Advisory Structure - A structure or structures for stable groups of students to meet regularly throughout the academic year with at least one assigned adult in an environment with sufficient time and opportunity to support student achievement in the academic, career, personal/social domains.”	Language originally existed within the middle level advisory section of the current regulations. The suggested change is to move it from the body of the regulations to the definitions section.
L-6-2.0: Ensuring grade level literacy and numeracy for all secondary RI schools	<p>Ensure students receiving extra support and intervention in core subjects are not precluded from electives (art, music, language, etc.)</p> <p>Support for the extension of numeracy skill acquisition to match that of literacy acquisition.</p> <p>The requirement for a Personal Literacy Plan should be put back into the regulations.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>	<p>The Basic Education Program charges each LEA to ensure that its students are provided with a comprehensive program of study that is guaranteed and viable in each content area from pre-kindergarten through grade 12. This will be emphasized in the accompanying secondary school regulations guidance.</p> <p>Comments in support of proposed regulations.</p> <p>State law requires a Personal Literacy Plan for elementary students reading below grade level. The previous regulations continued the PLP through the middle and high school level. Revisions to the regulations utilize the ILP as the central documentation of student goals, support, and progress, in</p>	

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	Extend support and intervention requirements to all core content areas.	No change.	<p>place of a multitude of plans. LEAs have the authority to maintain the use of a PLP at the middle and high school level, at local discretion.</p> <p>It is critical that state and school based resources are focused on ensuring students have a strong foundation in literacy and numeracy. Literacy and numeracy proficiency are essential to success in college, college and life.</p>	
L-6-2.1: Assessing literacy and numeracy proficiency levels of secondary students				
L-6-2.2: Improving literacy and numeracy for secondary students performing below grade level				
L-6-3.0: RI Diploma System	<p>Reinstate minimum level of achievement on the state assessment as a graduation requirement in literacy and mathematics</p> <p>Opposition to the use of standardized assessment as a graduation requirement and the regulations should disallow</p>	<p>No change.</p> <p>No change.</p>	<p>The regulations shift assessment from a student-based requirement to a school system-based incentive. There is nothing in the regulations that would prevent an LEA from adopting a minimum level of achievement on a state assessment as a graduation requirement. Comments were balanced on the issue of using state assessment for graduation purposes.</p> <p>The regulations shift assessment from a student-based requirement to a school system-based incentive. Comments were balanced on the issue of using state</p>	

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	<p>LEAs to use state assessment for graduation purposes.</p> <p>Add requirement to implement a comprehensive local assessment system in core content areas for all students</p>	No change.	<p>assessment for graduation purposes.</p> <p>The Basic Education Program states “each LEA shall develop a comprehensive assessment system that includes measures of student performance for the purposes of formative, interim, and summative evaluations of all students in each core content area.” RIDE has published Comprehensive Assessment System guidance.</p>	
L-6-3.1: Coursework Requirements	<p>Proficiency level should be defined by the state, not the LEA.</p> <p>Support arts proficiency as one of the core content areas.</p> <p>Support the flexibility in the definition of a course to include non-traditional learning experiences and focus on personalized pathways</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>	<p>All courses must be aligned to the appropriate state-adopted high school content standards. RIDE plans to publish guidance on proficiency levels for graduation, but acceptable proficiency levels to earn a diploma will be determined locally due to the fact that the LEA confers the diploma.</p> <p>Comments in support of proposed regulations.</p> <p>Comments in support of proposed regulations.</p>	

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	<p>Require a minimum of two courses in world language as a diploma requirement</p> <p>Support the changes to the provisions for students eligible for alternate assessment to earn a high school diploma; responsive to the ESSA changes.</p>	<p>No change.</p> <p>Change #2</p>	<p>LEAs have the ability to define a world language requirement at the local level, and many do. It is articulated in the regulations as one of the subjects that is presumed to make up a student’s program of study.</p> <p>“Students who achieve modified proficiency standards applied to coursework requirements for students determined to be eligible for the alternate assessment under federal law, state rules and regulations, and as noted in the student’s IEP, may, at LEA discretion, be awarded a diploma for graduation purposes.”</p>	<p>Language appeared twice in proposed regulations. The suggested change is to consolidate to one section of the regulations for clarity.</p>
L-6-3.2: Performance-based diploma assessments	Support changes from two required performance based diploma assessments to one.	No change.	Comments in support of proposed regulations.	
L-6-3.3: Appeals process for graduation decisions				
L-6-3.4: Council designations	<p>Develop specific criteria for Council Designations designed for all students, ensuring opportunity for all students to receive designation</p> <p>Provide state level facilitation of records to ensure equal</p>	<p>No change.</p> <p>Change #3</p>	<p>The language in the regulations state that the Council shall (after initial adoption of the regulations) determine which designations will be available statewide and the level of achievement necessary to earn a Council designation.</p> <p>“LEAs shall include a designation notation <u>on permanent high school</u></p>	<p><i>From proposed regulations:</i> “LEAs shall include a</p>

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	<p>opportunity to access Council Designations for highly mobile, homeless students and students in DCYF care.</p> <p>PARCC and SAT assessments should not be used to determine student eligibility for the Commissioner’s Seal Council Designation.</p> <p>Support for the use of standardized and state assessment as a Council Designation, the Commissioner’s Seal.</p>	<p>No change.</p> <p>No change.</p>	<p><u>transcripts</u> and on the diplomas of all students who meet Council-defined criteria.” Further guidance will be provided through the accompanying secondary school regulations guidance to ensure compliance with provisions for highly mobile students under ESSA.</p> <p>Council Designation criteria will be determined at a later date, after the initial adoption of the regulations.</p> <p>Comments in support of proposed regulations.</p>	<p>designation notation on the diplomas of all students who meet Council-defined criteria.”</p>
<p>L-6-3.5: Alternate recognition of high school accomplishment</p>	<p>Support the changes to the provisions for students eligible for alternate assessment to earn a diploma and recognize that this is responsive to the Every Student Succeeds Act.</p> <p>Return to original section language; concerned that the new language will incentivize LEAs to encourage underperforming students to</p>	<p>No change.</p> <p>Change #4</p>	<p>Comments in support of proposed regulations.</p> <p>“LEAs are authorized to recognize any student who has satisfactorily completed specific courses or other standards-based activities within the high school course of study, as defined by the LEA.</p>	<p><i>From proposed regulations:</i> “LEAs are authorized to recognize any student <u>who does not meet the diploma requirement but has otherwise</u></p>

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	leave high school with an alternative recognition, rather than a diploma		<u>Alternate recognition certificates shall not be considered a diploma.</u>	satisfactorily completed specific courses or other standards-based activities within the high school course of study, as defined by the LEA. <u>Students earning an alternate recognition certificate shall not be considered graduates.</u>
L-6-3.6: Council approved diploma system	The Commissioner should maintain the right to intervene in failing schools.	No change.	State law maintains the right of the Commissioner to enforce school law and intervene in school identified as needing improvement.	
L-6-3.7: LEA notification to students, families and community members of the requirements for graduation	Parents should be informed of graduation requirements earlier than the 9 th grade, as early as third grade.	No change.	Many students choose to attend a high school outside of their resident district, and LEAs have different local requirements. It would be more confusing for parents and families to communicate a variety of graduation requirements, versus definitive requirements upon entrance to high school.	
L-6-4.0: Middle level and high school support to students	With a greater focus on personalization and the ILP for all students, ensure that the IEP process is fully upheld.	No change.	These regulations work in partnership with the Regulations Governing the Education of Children with Disabilities. LEAs must still comply with IEP requirements and, where appropriate, the IEP should align with the student's ILP.	

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L-6-4.1: Supports for students	Support the identification of struggling students through the use of an early warning system no later than 6 th grade.	No change.	Comments in support of proposed regulations.	
L-6-4.2: Requirement for personalized learning environments	Not truly personalized, with expectations that teachers teach the same curriculum aligned to the same standards to all students.	No change.	Standards provide clear, consistent expectations about what knowledge, skills, and practices students should have and learn at each grade level so teachers and parents know what they need to do to help students achieve them.	
L-6-4.3: Individualized Learning Plan	Require LEAs to transition to a single statewide ILP document, making school-to-school and district transitions more seamless	No change.	The regulations allow the use of a single, central ILP document to track student goals, supports and progress, but do not mandate the transition The transition will be encouraged in the accompanying secondary school regulations guidance.	
L-6-4.4: Professional development	Extend the professional development priority focus to all core content areas.	Change #5	Current regulations language applies to all certified educators. “All certified educators in middle level and high schools shall participate in at least fifteen hours of ongoing professional development annually, focused on the priority areas <u>of literacy and numeracy throughout the curriculum</u> , graduation by proficiency, and personalization.”	<i>From current regulations:</i> “All certified educators in middle level and high schools shall participate in at least fifteen hours of ongoing professional development annually, focused on the priority areas of <u>literacy, numeracy</u> , graduation by proficiency, and personalization.”

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	Add clause that all students are entitled to expert instruction in all courses.	No change.	Section G-13-2. of the Basic Education Program outlines requirements for effective instruction for all students.	
L-6-4.5: Common Planning time				

Other Related Comments	<p>Review the Regulations Governing Children with Disabilities to ensure ESSA provisions are addressed.</p> <p>Update the Basic Education Program to align language with revised secondary regulations, adopted state standards, and other regulatory changes.</p> <p>Open Secondary School Regulations prior to 2020 to consider enhanced expectations and measures for Rhode Island high school graduation.</p>
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