



**RHODE ISLAND KIDS COUNT**

ONE UNION STATION  
PROVIDENCE, RHODE ISLAND 02903  
401/351-9400 • 401/351-1758 (FAX)

**Public Comment Re: Proposed Revisions to the *Secondary Regulations* (200-RICR-20-10-2) and Proposed FY2024 Budget  
Council on Elementary and Secondary Education  
October 3, 2022  
Paige Clausius-Parks, Senior Policy Analyst**

Madam Chair and members of the Council, thank you for the opportunity to provide public comment today. Rhode Island KIDS COUNT would like to express our support of the newly proposed revisions to the *Secondary Regulations* related to College and Career Ready Requirements (2.3.3) and several elements of the proposed FY2024 budget.

**Proposed Revisions to the *Secondary Regulations***

Rhode Island KIDS COUNT supports efforts that increase the percentage of students who complete the Free Application for Federal Student Aid (FAFSA), because we know that students who complete the FAFSA are more likely to enroll in college. However, the initial proposal was written in a way that could have penalized students who did not complete the FAFSA, alternate state form or waiver by withholding graduation. **We are pleased that the revisions presented for tonight's discussion make school districts responsible for sharing information about FAFSA and encouraging students to complete the FAFSA or state alternative form rather than placing the sole responsibility on students and includes a requirement for RIDE to report disaggregated data in the school accountability system.**

We are pleased that these revisions reflect the feedback from youth, parents and community organizations solicited through the robust community engagement process. We would like to thank Steve Osborn, Olivia Smith, and this Council for your diligence to get this right and to include the voices of those most impacted in this process.

**FY2024 Budget**

Rhode Island KIDS COUNT would like to express our support of several elements of the proposed FY2024 budget.

**Multilingual Learners**

There are large and unacceptable disparities in academic outcomes by language status. In Rhode Island in 2021, 12% of third-grade MLLs/ELs met expectations in reading compared to 45% of Non-Multilingual Learners, and 6% of third-grade MLLs/ELs students met expectations in math compared to 28% of Non-Multilingual Learners on the *Rhode Island Comprehensive Assessment System (RICAS)*. Multilingual Learners need additional supports to achieve proficiency in reading and math. We support the proposed investment in a new position at the Department to develop and train

educators in model practices for teaching MLL/ELs and the investment of \$12.8 million for the MLL categorical fund to support the needs of Multilingual Learners. We encourage RIDE to ensure that multilingual education is supported across the state's early childhood system, including RI Pre-K, Head Start, child care, Early Intervention, and preschool special education.

#### Transformation Specialist

In Rhode Island in the 2018-2019 school year, 35 schools (12%) were given a one-star rating, 59 schools (20%) were given a two-star rating, 134 schools (45%) were given a three-star rating, 49 schools (16%) were given a four-star rating, and 22 schools (7%) were given a five-star rating. Seven percent of schools in Rhode Island are identified as in need of Comprehensive Support and Improvement, and 17 of these 22 schools were located in the four core cities – Central Falls, Pawtucket, Providence, and Woonsocket. We support the proposal to create a new position at RIDE to support persistently low-performing schools

#### Data Research for Assessment Data

Rhode Island KIDS COUNT supports efforts to increase the department's ability to collect, report, and analyze data. We hope adding staffing will allow RIDE to comply with legislation that requires important and timely reporting of equity data, including the disaggregation of data for Southeast Asian students and outcome data related to students in foster care.

#### Expanding the Teacher Workforce

In October 2020, 96% (12,281) of Rhode Island public school educators identified as white, 5% (514) as Hispanic, 2% (292) as Black, 1% (134) as Asian/Pacific Islander, 1% (116) as Multi-Racial, and less than 1% (30) as Native American. Educators of Color benefit all students, especially Students of Color. Students of Color demonstrate long-term academic achievement including higher reading and math test scores, decreased likelihood of dropping out of high school, increased likelihood of going to college, and increased social and emotional development in classes with Teachers of Color. We support investments that will help expand and diversify the teacher workforce.

#### Increase Student Success Factor

Poverty is linked to every KIDS COUNT indicator. Children in poverty, especially those who experience poverty in early childhood and for extended periods, are more likely to experience difficulty in school and less likely to be reading at grade level, meet grade level expectations in math, and graduate from high school. Children in poverty are more likely to attend schools that lack resources and have fewer opportunities to participate in extracurricular activities. Rhode Island KIDS COUNT supports efforts to review the education funding formula and increase the resources school districts receive so they can meet the educational needs of our kids living in poverty.

#### High-Cost Special Education

Despite improvements in high school graduation rates and post-secondary school enrollment, students with disabilities are still less likely to graduate from high school and more likely to be suspended than students without disabilities. In Rhode Island, students with disabilities are

much less likely to meet or exceed expectations on the *Rhode Island Comprehensive Assessment System (RICAS)*. Rhode Island KIDS COUNT supports efforts to increase funding to support students with extensive special education needs.

### Early Childhood

Rhode Island KIDS COUNT supports the proposed increased in categorical aid for early childhood education and **asks RIDE to ensure that there is sufficient funding in the state budget to maintain all RI Pre-K seats and to ensure compensation is equitable across the RI Pre-K and K-12 system.** Rhode Island made a commitment to ensuring that all RI Pre-K teachers would have compensation parity with K-12 educators who have similar qualifications. Compensation parity is essential so we can retain highly qualified and highly effective educators in early childhood programs. [A May 2022 report found that there is a \\$25,000 gap in salaries with RI Pre-K teachers who work in community-based settings \(settings that are often more responsive to the needs of working parents and can be more culturally and racially inclusive\) earning only \\$62,000/year while RI Pre-K teachers in public school settings were earning \\$87,000/year.](#) **In addition, we urge RIDE to ensure districts have enough funding to ensure they can complete developmental screenings on every child who lives within their district boundaries every year from age 3 through K entry and to complete IDEA eligibility evaluations on all young children referred for developmental concerns.** In 2021, only 23% of children ages 3 to 5 received a developmental screening statewide (and some district such as Providence only completed screenings for 15% of children) and less than half of children who were referred for a developmental concern (from a screening or otherwise) received an evaluation for IDEA services.