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Public Comments Re: Proposed Revisions to the Secondary Regulations (200-RICR-20-10-2)

Rhode Island Department of Education

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Thank you for the opportunity to provide public comment on the proposed revisions to the *Regulations Governing the Secondary Regulations*. Rhode Island KIDS COUNT would like to voice its support for several key elements of the proposed revisions to the secondary regulations.

2.3.1 Credit Requirements

Adopting student-centered learning practices at the high school level can help students develop meaningful relationships with adults inside and outside of school, increase engagement and achievement for students from a variety of backgrounds, and ensure that students graduate from high school with important social and emotional skills, including problem solving, critical thinking, communication, collaboration, and strong work habits that are essential for success in college and careers. There are four key tenets of student-centered learning:

- (1) learning that is personalized;
- (2) learning that is competency-based;
- (3) learning that happens anytime, anywhere; and
- (4) learning that allows students to take ownership.

We are pleased that many of the proposed revisions to the *Secondary School Regulations* include these key tenets.

Competency-Based Learning

Competency-based learning bases student advancement on mastery of skills and academic content, rather than age, seat time, or hours on task. In competency-based learning, students are provided with clear learning objectives, given control over their own learning and work pace, and able to demonstrate mastery in multiple ways to show a thorough understanding of the competencies being assessed (e.g., content knowledge or critical skills, such as communication and collaboration). Students receive timely, differentiated instruction based on their individual learning needs.

Rhode Island's *Secondary School Regulations* already support competency-based learning. These regulations state that course completion is defined by "demonstration of the knowledge, skill, and competencies outlined in the course learning objectives" and focus on demonstrated proficiency rather than seat time. Rhode Island was the first state to adopt a proficiency-based diploma, and the state's regulations and strategic plan show strong support for competency-based learning. However, competency-based learning is not being widely and fully adopted statewide.

We agree with proposed revisions to strengthen competency-based learning in all school districts by changing the language from "course" requirements to "credit" requirements and the recommendation for school districts to explore flex credits to meet credit requirements.

Learning that Happens Anytime, Anywhere

In 2017, Young Voices and Rhode Island KIDS COUNT conducted six focus groups with students from seven public high schools in Central Falls, Pawtucket, and Providence to get their perspectives about what teaching and learning looks like in their schools currently and what experiences they have had with more “student-centered” approaches to learning. We also followed up with short videos highlighting students’ experiences that are still available on our website. In these focus groups and videos, students talked about the value of the courses they were able to access through the Advanced Coursework Network (now the All Course Network or ACN), internships, career and technical programs, and other personalized learning opportunities that allowed them to pursue a personal interest, learn in a different way, or gain college credit.

Other students talked about the college courses they took through the ACN or the PrepareRI Dual Enrollment Program. These courses helped students prepare for the rigor of college classes, pursue deeper knowledge in a subject area of interest, and potentially save money by completing college credits before they even graduate from high school.

Rhode Island KIDS COUNT supports the proposed revisions that allow students to earn credits through the ACN, state-approved career and technical programs, expanded learning opportunities, dual enrollment/concurrent enrollment, on-line learning, experiential learning opportunities, and other non-traditional academic and career-readiness learning experiences. We agree with the strong encouragement for school districts to allow the use of the ACN to meet graduation requirements.

High School Graduation and College Admission Requirements Alignment

In Rhode Island, high school graduation requirements and college admission requirements are misaligned. In 2020, an audit of 2,253 Rhode Island high school student transcripts found 14% of ninth graders were already off track for college eligibility. Audit findings showed that 78% of Black students and 76% of Latinx students were not college or career ready compared to 44% of white students.

Rhode Island KIDS COUNT supports efforts to align Rhode Island high school graduation requirements with the admissions requirements of our public colleges and universities. The inclusion of Algebra I, Algebra II and Geometry, two lab sciences, and two credits of world languages in the same world language are necessary changes to ensure all Rhode Island public school students are eligible for admission to our public postsecondary institutions.

2.4.1 Supports for Students

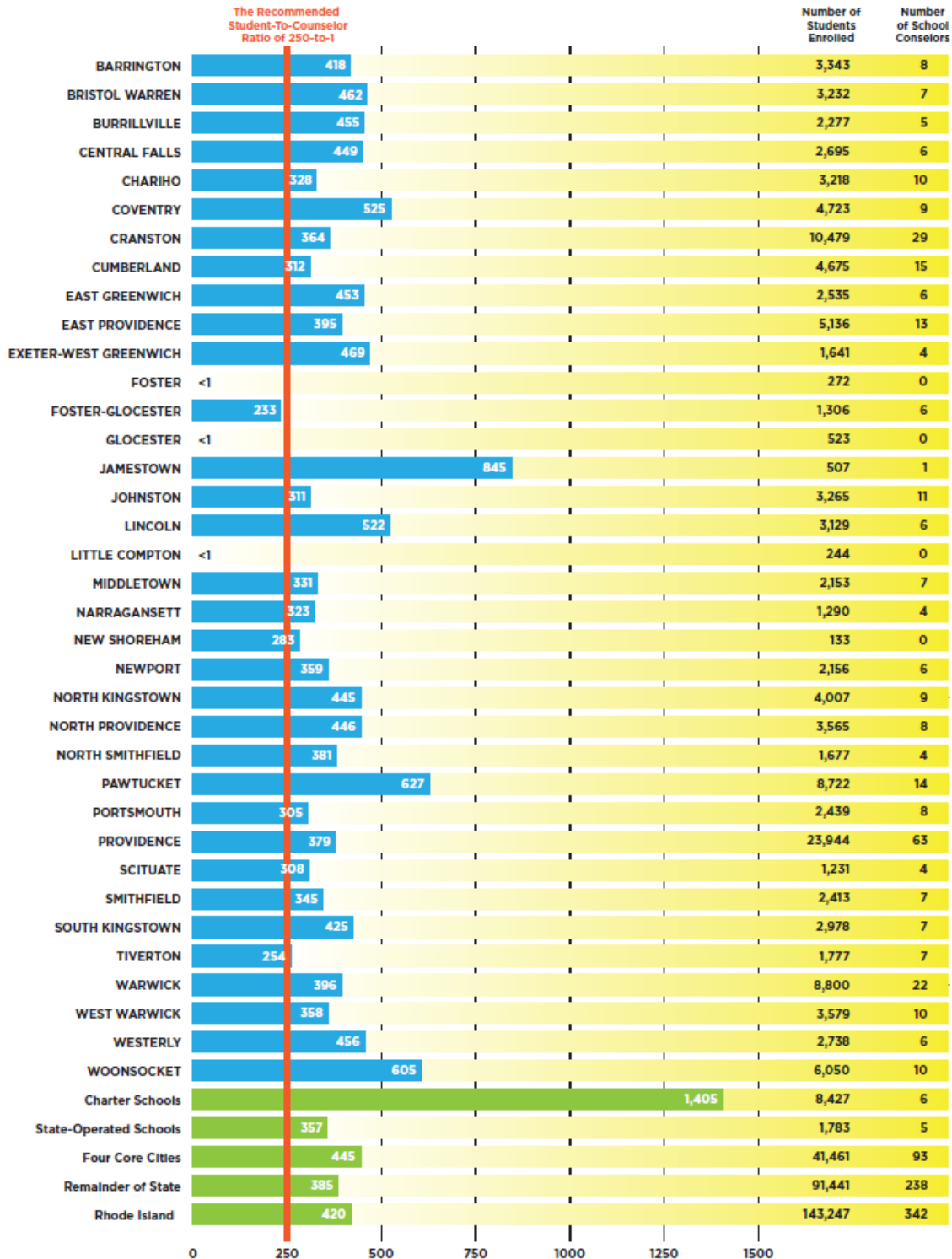
The level of family involvement and engagement in schools is directly related to the quality of the relationships built between families and educators, school personnel, and administrators. A shared belief in the importance of family-school relationships, a commitment to maintain clear, consistent and linguistically-appropriate communication with families, and relationships built on respect, accountability and cultural awareness improve academic outcomes, student attendance, graduation rates, and post-secondary success.

Equitable collaboration between families and schools is characterized by a reciprocal partnership in which families and schools emphasize relationship-building, work together to develop goals, co-develop a strategy for achieving student success, and include parents as experts on their own children. Active family engagement develops in schools where parents and families have a meaningful role in decision-making about issues that affect learning including curriculum, teaching, hiring, and budgeting and is linked to school improvement and student achievement.

Rhode Island KIDS COUNT supports the revision in section 2.4.1.4 that states school districts shall provide an annual update to parents on the progress of their child towards academic performance targets necessary for earning a diploma and graduating ready for college and career success. We urge this language to be strengthened to require school districts to provide this annual update to parents.

Rhode Island KIDS COUNT would like to voice its **opposition** to **2.3.3 College and Career Ready Requirements: FAFSA Completion**. We support 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, we oppose regulations that penalize students and create additional burdens for families and do not provide additional resources to schools to help implement those regulations.

Rhode Island Student-to-School Counselor Ratio, 2018-2019 School Year



Sources: U.S. Department of Education, National Center for Education Statistics, Common Core of Data, State Nonfiscal Public Elementary/Secondary Education Survey, 2018-2019. Rhode Island Department of Education, Public school enrollment in pre-school through grade 12 as of October 1, 2018. Note: Foster, Glocester, Jamestown, Little Compton, and several charter schools do not serve secondary school students.

We at Rhode Island KIDS COUNT are **concerned about the ability of school districts that serve a high percentage of low-income students, Students of Color, and Multilingual Learners to implement such a policy without additional financial and staffing supports.** In 2020, the lowest FAFSA completion rates were in Woonsocket (40%), Central Falls (43%), and Pawtucket (45%) compared to 63% in the Remainder of State, and these communities are among those with the least financial resources in the state.

Recommended Changes to the Revisions

We recommend the proposed regulations include **additional resources** to school districts so FAFSA completion efforts are staffed adequately and do not unintentionally contribute to inequities. The National College Attainment Network, a leader in college access research, policy and advocacy, recommends states considering a FAFSA completion requirement **provide a minimum of one full FAFSA cycle from adoption before the requirement takes effect, build and provide robust training and support through school counselors and college access advisers and provide regular data-sharing between schools and community-based college access organizations** (e.g., College Crusade, College Visions, etc. in Rhode Island) to allow for targeted FAFSA completion efforts.

We also urge the Council to consider including a provision that requires school districts to report the number of students who have completed FAFSA or the Rhode Island alternative financial aid application or submitted a waiver, and to disaggregate this data by race, ethnicity, disability, and language status to help determine how equitable the implementation of this policy is and ensure the intent of this regulation is achieved.

Increasing the percentage of high school students who complete the FAFSA requires strong, trusting relationships with families that includes culturally and linguistically appropriate communications about the importance of going to college, supports to help students and families navigate the college application and admissions process, and assistance with the FAFSA verification process.

Thank you for the opportunity to provide public comment.