Summary of Public Comment – RIDE's Proposed Revisions to the Secondary Regulations

Public Comment Period: *March 7, 2022 – May 10, 2022 and December 2, 2022 – January 1, 2023*

Navigating the Document:

⇒ Theme 1: Arts
⇒ Theme 2: College Alignment
⇒ Theme 3: Real World Relevant Proficiency Requirements
⇒ Theme 4: Physical Education/Health
⇒ Theme 5: Special Education
⇒ Theme 6: Multilingual Learners
⇒ Theme 7: Seat Time
⇒ Theme 8: College and Career Readiness
⇒ Theme 9: Flex Credits
⇒ Theme 10: Supports for Students
⇒ Other Comments
⇒ Full Proposal

Understanding the Document:

- The role/affiliation of individuals and groups that provided public comment can be found in the "Commentors" column of the table below.
    - Roles/affiliations were recorded based upon how individuals identified themselves.
        - If an individual did *not specify their role/affiliation*, or if they *specified multiple roles/affiliations*, they are recorded as a "stakeholder"
    - Role-like groups such as stakeholders, educators, students, parents, etc. Have @**numbers** next to them depicting the number of individuals that identified themselves as that role/affiliation and that commented on the same theme/section of the regulation.
        - (E.g.: "@3 parents" means that 3 individuals who identified their role as being parents commented on the same theme or section).
    - Groups, associations, committees, or organizations that submitted public comment are recorded by their group name, without an accompanying **number** because it is assumed that comment is made on behalf of that entire group.
    - In the column "Summary of Comments", if the summary is organized numerically, there are corresponding numbers following the title of each commentor's role in the "commentors" column. (E.g., Commentors: "@6 educators (#2-3)" the (#2-3) corresponds to the numbers in the "Summary of Comments" column).
- The suggested change to language or rationale for no change describes why RIDE did or did not make a change to the proposed regulatory revision based upon the public comment received, categories for change rationale include:
    - "**Change**" meaning that RIDE has made a revision to the final regulatory proposal based upon this public comment.

- "**No Change**" meaning that RIDE has not made a revision to the final regulatory proposal based upon this comment. The entry will include the rationale for RIDE did not incorporate this revision in the final regulatory proposal. This rationale may be that the comment is unrelated to the Secondary Regulations, that the comment is related to implementation guidance, or that the comment is applicable to the Secondary Regulations, but RIDE has not made a change for a particular or specific reason.
- "**No Change Requested"** meaning that the comment was in support of RIDE's proposed regulatory language and therefore no change will be made based upon that public comment.

Theme	Regulation Section (or topic)	Commentors	Summary of Comments	Suggested Change to Language or Rationale for No Change
Arts	§2.3.1(C) §2.1(A)(20)	• @50 members of the RI Music Education Association • Petition on behalf of the RI Music Education Association with 5,209 signatures • @1 member of Arts and Cultural Alliance of Newport County • COYOTE RI • @3 representatives of Festival Ballet Providence (#1) • @3 stakeholders (#1) • @4 educators (#1) • Advocacy co-chair of RI Music Education Association (#1) • @1 student (#1) • @1 community member (#1) • @1 stakeholder (#1-2) • @1 educator (#1-2) • @1 educator (#1-3) • @1 student (#1-3)	1. Clearly require at least one full credit in arts coursework in high school for all students. 2. Clearly define "arts proficiency", including specific definitions and examples of arts proficiency. 3. Remove the concept of flex credits from the regulations or specify that flex credits cannot take the place of any standalone mandated minimum academic credits. 4. Requesting a full-time art content specialist be added to the RIDE staff **2 educators noted that the regulatory language on the arts is "vague"*	1. Change – The final regulatory language responds to feedback from the arts community on the need to make sure every child receives access to arts education. RIDE has clarified that art education shall meet the requirements outlined in 200-RICR-20-10-1, the R.I. Basic Education Program. 2. No Change – Arts proficiency is defined within 200-RICR-20-10-1, the R.I. Basic Education Program. 3. No Change - This is related to implementation guidance. The teaching of flex credits will be required to comply with teacher certification regulations which mitigates the concern received via public comment. 4. No Change – RIDE does not define agency staffing in the Secondary Regulations. RIDE publicly posted an Arts

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		• RI Theatre Education Association (#1-3) • @1 educator (#3) • @1 representative of Festival Ballet Providence (#3) • @1 RI School of Design staff/faculty (#3) • @1 educator (#4) • @4 stakeholders (#1-2, #4) • @6 educators (#1-2, #4) • @2 retired educators (#1-2, #4) • @2 former students (#1-2, #4)		Education Coordinator position on August 26, 2022. *The final proposal aims to provide greater clarity around the expectation for arts education in response to the feedback that this regulatory language is vague.
	§2.1(A)(9) §2.3.1(C) §2.3.1(C)(7)	• @60 Individuals on behalf of the RI Art Education Association • @6 RI School of Design faculty/staff members • @5 stakeholders • @3 educators • @2 RI College faculty/staff members • @1 RI School of Design student • @1 RI School of Design staff/faculty (#3) • @1 stakeholder (#3)	1. Formal acknowledgement and support of the inclusion of Arts as a Core Content area 2. Requesting that the Fine Arts credit be a requirement as one full credit listed within graduation requirements and taught by a content certified educator utilizing content specific standards 3. Requesting more direct verbiage because the verbiage of "presumed" does not fully endorse the required credits for the Fine Arts education *Many public comments on this regulatory section included a claim that the BEP is not in regulation.*	1. No Change Requested – Comment is in support of proposed regulatory language 2. Change – The final regulatory language responds to feedback from the arts community on the need to make sure every child receives access to arts education. This will ensure every child will take at least .5 credit in the arts. RIDE does not specify fine arts from other artistic disciplines. 3. Change – The final proposal

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				includes revised language that will increase the clarity of credits required for graduation. "Presumed to include but not limited to" will be replaced with "shall include".
	§2.1(A)(9)	• @2 RI School of Design staff/faculty • @2 stakeholders	Urge the reinstatement of the arts as a core content area in high school	No Change - Arts is included as a core content area in the secondary regulations.
	2.3.1(B)	• Woonsocket School Committee	Oppose removal of arts from list of core proficiencies	No Change - Arts is included as a core content area in the secondary regulations.
	§2.3.1(C)	• @1 member of RI Art Education Association • @1 parent • @1 educator • @1 stakeholder	Requesting that a Visual Arts credit be a requirement as a full credit listed within the 20 full credits	Change – The final regulatory language responds to feedback from the arts community on the need to make sure every child receives access to arts education. RIDE does not specify fine arts from other artistic disciplines.
		• @18 parents • @4 stakeholders • @4 educators • @ RI School of Design President and Interim Museum Director • @1 RI School of Design staff/faculty	Requesting art be a graduation requirement	Change – The final regulatory language responds to feedback from the arts community on the need to make sure every child receives access to arts education.

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		• @1 parent • @1 student • @1 stakeholder	Requesting music be a part of the required statewide curriculum	Change – The final regulatory language responds to feedback from the arts community on the need to make sure every child receives access to arts education. RIDE does not specify fine arts from other artistic disciplines.
		• @1 stakeholder	Requesting art and music be a graduation requirement (minimum .5 credit)	Change – The final regulatory language responds to feedback from the arts community on the need to make sure every child receives access to arts education. RIDE does not specify fine arts from other artistic disciplines.
	§2.3.1(C)(6)	• RI Theatre Education Association	Specify that arts courses could fulfill the proposed requirement for one credit of additional college preparatory coursework	No Change - This is related to implementation guidance. RIDE will work with postsecondary education intuitions including the University of Rhode Island and Rhode Island College to determine which arts credits can fulfil the additional college preparatory coursework requirement.
	§2.3.1(C)(7)	• @2 stakeholders • @1 educator • Advocacy Co-Chair of RI Music Education Association	Requesting art be separated from the "additional required credits" section	No Change – The final proposal will include more direct verbiage but will not separate the content areas from this section. RIDE understands separating these content areas may lead to a reduction in locally required credits.
	General Comment: Importance of arts education	• @3 students • @4 educators • @5 stakeholders • @2 parents	General comment about the Importance of Arts Education	Change - The final regulatory language responds to feedback from the arts community on the need to make sure every child receives access to arts education.

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	General Comment: "Removal" of Arts Education	• @1 former principal • @3 parents • @9 stakeholders • @4 RI School of Design staff/faculty • @5 educators • @1 member of RI Music Education Association • The Womxn Project	Opposition to the removal of arts education from statewide graduation requirements	No Change – RIDE did not propose the removal of arts education from statewide graduation requirements.
College Alignment	§2.3.1(C)	• Director of RI School for the Deaf • RI KIDS COUNT x2 • @2 stakeholders • @1 RI School of Design staff/faculty • The XQ Institute	Support for the proposal to align the statewide coursework requirements for graduation with the admissions requirements at the University of Rhode Island and Rhode Island College **@1 stakeholder supports coursework alignment, but is concerned due to students' current academic performance in ELA and Math*	No Change Requested – The comment is in support the proposal's goal of aligning high school graduation requirements to college admissions requirements.
		• @4 stakeholders • @4 parents • @1 educator • @1 student • President of RI School Superintendents Association • Woonsocket School Committee	Opposition to proposed coursework alignment to the college admissions requirements	Change – RIDE is committed to increasing alignment between the secondary regulations and expectations for college and career readiness. RIDE also recognizes the operational challenges that districts and schools face. The final proposal will include revised regulatory language to align the high school graduation requirements with college and career readiness requirements. All students will be expected to complete college and career-ready coursework with the option for a student to take alternate RIDE-approved readiness coursework as decided through an informed parental consent process.

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		• @1 retired educator • @3 parents • President of R.I. Federation of Teachers • RI School of Design President and Interim Museum Director • @2 educators • Executive Director of RI Association of School Principals • @2 students • @1 school committee member • @4 stakeholders • Chair of Career and Technical Education Board of Trustees • Chariho Alternative Learning Academy • @1 school counselor • RI Special Education Advisory Committee • @1 assistant superintendent • Advocacy Co-chair RI Music Education Association • 360 High School Community Advisory Board • RI School Superintendents	Concern with proposed coursework alignment to college admissions requirement ** RI School of Design President and Interim Museum Director state this downplays the importance of Arts education.* **Executive Director of RI Association of School Principals is concerned it will limit students' ability to explore passions in art, music, or Career And Technical Education (CTE)* **@1 School Committee member noted concern for students in CTE and students with disability re: algebra II and world language* **1 stakeholder requested additional flexibility for students in RIDE-approved CTE programs* ** Chair of Career and Technical Education Board of Trustees noted concern that this alignment will limit students' ability to complete CTE programs* **RI Special Education Advisory Committee recommends including more math options, such as personal finance, and increase access to the arts, by providing these courses as alternative required credits.* ** 360 High School Community Advisory Board cited concerns for scheduling, and lack of available certified teachers.*	Change – All students will be expected to complete college and career-ready coursework with the option for a student to take alternate RIDE-approved readiness coursework as decided through an informed parental consent process.

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		Association Executive Board • President of the R.I. School Counselor Association		
		• @2 representatives on behalf of Festival Ballet Providence	Request that RIDE increase the required credits to 22	No Change – The minimum 20 credits RIDE has proposed students graduate with align to the minim entrance requirements at URI and RIC. Schools and districts may implement additional credit requirements.
		• @1 member of S.T.R.O.N.G.	Students should be able to demonstrate proficiency to test out of required coursework	No Change – RIDE's proposal sufficiently provides LEAs the flexibility to award credit to students who have demonstrated proficiency.
		• RI Special Education Advisory Committee	Recommend required credits include Career and Technical Education	No Change – Students will not be required to take career and technical coursework.
		• @1 parent • @1 educator	Concern with the increase in required credits **@1 parent noted specifically for students in RIDE-approved Career and Technical Education programs.* **@1 educator noted mental health concerns for students*	No Change - RIDE's proposal did not include a proposal to increase the required number of credits students are expected to complete.
	§2.3.1(C)(2)	• @1 parent • @2 stakeholders • @5 educators • @1 school counselor • @1 community	Concern with proposed coursework alignment to the college admissions requirements, specifically Algebra II	Change – All students will be expected to complete college and career-ready coursework with the option for a student to take alternate RIDE-approved readiness

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		member • @1 stakeholder on behalf of the RI School Superintendents Association • RI School Superintendents Association Executive Board • RI School Counselor Association	**@1 community member and @1 stakeholder on behalf of the RI School Superintendents Association recommend statistics be an alternative to the proposed Algebra II requirement*	coursework as decided through an informed parental consent process.
		• RI KIDS COUNT x2 • @1 member of the R.I. General Assembly	Support for the proposal to include Algebra I, Algebra II, and Geometry	No Change – This comment is in support of RIDE's proposed regulatory language.
		• @1 school counselor	Concern for the proposed Algebra II requirement for multilingual learners	Change – All students will be expected to complete college and career-ready coursework with the option for a student to take alternate RIDE-approved readiness coursework as decided through an informed parental consent process.
		• @1 teacher	Concern for the proposed Algebra II requirement for differently abled students	Change – All students will be expected to complete college and career-ready coursework with the option for a student to take alternate RIDE-approved readiness coursework as decided through an informed parental consent process.
		• @1 superintendent	Concern about the lack of available certified math educators	No Change – RIDE's proposal does not increase the number of math credits that students will be required to take to earn a high school diploma.

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	§2.3.1(C)(3)	@1 stakeholder	Removal of the proposed 2 lab science requirement, unless it can be satisfied without biology	Change – All students will be expected to complete college and career-ready coursework with the option for a student to take alternate RIDE-approved readiness coursework as decided through an informed parental consent process.
		• RI KIDS COUNT x2	Support for proposed coursework alignment to the college admissions requirements, specifically the proposal to include two lab sciences	No Change – This comment is in support of RIDE's proposed regulatory language.
	§2.3.1(C)(5)	• @3 stakeholders • @1 school counselor • @1 parent • @5 educators • Director of William M. Davies, Jr. Career & Technical High School • @2 assistant superintendents • President of R.I. Federation of Teachers • @2 superintendents • @1 stakeholder on behalf of the RI School Superintendents Association • Vice President of the Pawtucket Teachers Alliance • RI School Superintendents Association Executive Board • President of the R.I.	Concern with proposed world language requirement **@1 assistant superintendent noted concern with lack of certified world language teachers and potential Impact on student schedules* **@2 superintendents, @1 stakeholder on behalf of the RI School Superintendents Association and the RI School Superintendents Association Executive Board noted concern due to the lack of certified world language teachers available*	Change – All students will be expected to complete college and career-ready coursework with the option for a student to take alternate RIDE-approved readiness coursework as decided through an informed parental consent process.

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		School Counselor Association		
		• @1 educator • @1 parent • @3 school committee members • @1 stakeholder • Woonsocket School Committee	*Opposition to the proposal to include two credits of the same world language* **Woonsocket School Committee noted opposition due to the lack of certified world language teachers available*	Change – All students will be expected to complete college and career-ready coursework with the option for a student to take alternate RIDE-approved readiness coursework as decided through an informed parental consent process.
		• @1 school counselor • @2 stakeholders • @2 parents • @2 educators • Executive Director of RI Association of School Principals • @1 superintendent	Concern with the proposed world language requirement specifically for students in RIDE-approved Career and Technical Education (CTE) programs **1 superintendent, 1 stakeholder and the Executive Director of RI Association of School Principals suggested adopting a waiver for Career and Technical Education students*	Change – All students will be expected to complete college and career-ready coursework with the option for a student to take alternate RIDE-approved readiness coursework as decided through an informed parental consent process.
		• @ 3 stakeholders	Concern with the proposed world language requirement	Change – All students will be

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		• @2 educators • @2 school counselors • @3 parents • Woonsocket School Committee • RI School Counselor Association	specifically for differently abled students **1 Stakeholder requested removal of this requirement for students with IEPs and 504 plans* **Educator proposed questions for implementation regarding teacher training, redesigning courses, flexibility for students needing literacy skill development.*	expected to complete college and career-ready coursework with the option for a student to take alternate RIDE-approved readiness coursework as decided through an informed parental consent process.
		• @1 school counselor • @1 school committee member • Woonsocket School Committee • RI School Superintendents Association Executive Board	General concern for the proposed world language requirement specifically for multilingual learners	Change – All students will be expected to complete college and career-ready coursework with the option for a student to take alternate RIDE-approved readiness coursework as decided through an informed parental consent process.
		• @1 stakeholder • @3 educators • RI Teachers of English Language Learners representing 200+ RI educators x3 • @1 community member • @1 stakeholder	Students should be able to test out of the world language requirement **RI Teachers of English Language Learners and @1 community member specifically recommends these credits still be transcribed on student's high school transcripts*	No Change – The proposed regulatory language establishes an approach to education and awarding academic credit that recognizes and values the assets and experiences of Rhode Island's multilingual learners. * RIDE will ensure the expectation of schools to communicate student proficiency in languages other than English on students' high school transcripts is included in implementation guidance.
		• @ 1 assistant superintendent	Request that multilingual learners' lingual assets be honored	No Change - the proposal established an approach to education and awarding academic credit that recognizes and values the assets and experiences of Rhode Island's multilingual learners.

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		• @1 stakeholder	Request that the proposed world language requirement be waived for students who receive the seal of biliteracy	No Change – Students must receive credit in world language to graduate eligible for URI, RIC, and most postsecondary institutions.
		• @1 stakeholder • @6 educators • @1 RI College staff/faculty	Support for the proposal to include two credits of world languages in the same language.	No Change – This comment is in support of the proposed regulatory language.
	§2.3.1(C)(6)	• President of R.I. Federation of Teachers • @1 school counselor • RI Special Education Advisory Committee	Concern with the proposal to include one additional college preparatory unit. **RI Special Education Advisory Committee recommends students be able to waive this requirement*	Change – All students will be expected to complete college and career-ready coursework with the option for a student to take alternate RIDE-approved readiness coursework as decided through an informed parental consent process.
		• @1 assistant superintendent	Need to define “College preparatory coursework”	No Change – This is related to implementation guidance.
	§2.3.1(C)(7)	• @1 educator	Replace “presumed” with “shall”	Change – RIDE recognizes the desire for clarity around this regulatory language. The final proposal includes regulatory language that replaces “presumed to include but not limited to” with “shall include.”
	§2.3.1(C)(8)	• President of R.I. Federation of Teachers	Opposition to the proposed language “Every student shall be required to attempt the credit sequence stated”	Change – All students will be expected to complete college and career-ready coursework with the option for a student to take alternate RIDE-approved readiness coursework as decided through an informed parental consent process.

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	2.1(A)(11)	• @1 educator	Request "world language" be added to the list of core content areas	Change – World language will be included in the definition of core content areas in the secondary regulations.
	2.3.1(D)	• 360 High School Community Advisory Board • President of the R.I. School Counselor Association	Support for additional schedule flexibility for students on-track to complete a high-skill, high growth, Career and Technical Education program, and/or full-time dual enrollment	No Change – This comment is in support of the proposed regulatory language.
Real World Relevant Proficiency Requirements	§2.3.2(A)(1)	• RI Civic Learning Coalition • Generation Citizen • @6 stakeholders • @1 former student • @13 RI Civic Learning Coalition Youth Fellows • RI League of Women Voters of South County • @1 member of the R.I. General Assembly • @2 Alliance of Rhode Island Southeast Asians for Education student members • @1 parent • 360 High School Community Advisory Board	Support for proposed civics proficiency requirement **1 member of the RI General Assembly recommended civics be taught as a part of the history credits* **1 parent suggested incorporating civics in middle school social studies*	No Change – This comment is in support of the proposed regulatory language.
		• 10 RI Civic Learning Coalition Youth Fellows	Urge RIDE to strengthen the proposed civics requirement	No Change – RIDE will consider revisions to the proposed civics requirement recommended by the R.I. Civic Readiness Taskforce.
		• @1 former student	1. Require at least a half credit course in civics.	No Change – RIDE will consider

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		• @5 RI Civic Learning Coalition Youth Fellows • RI League of Women Voters of South County • RI Civic Learning Coalition • RI Civic Learning Coalition Petition signed by 44 individuals • Generation Citizen • @2 Alliance of Rhode Island Southeast Asians for Education Student Members	2. Clearly define civics proficiency. 3. Require that students complete a student-led civics project, as mandated by the Rhode Island Civic Literacy Act signed into law last year. 4. Require a performance-based diploma assessment for civics that assesses the completion of a student-led civics project. 5. Add definitions of "civics" and "student-led civics project" to the "definitions" section. *18 individuals who signed the RI Civic Learning Coalition Petition shared additional comments noting • The general importance of civics education • Requesting RIDE ensure that the mandates of the 2021 Civic Literacy Act are clearly represented in the revisions of the secondary regulations • Recommending the inclusion of Environmental Studies, Equity Engagement and Anti Racism Studies	revisions to the proposed civics requirement recommended by the R.I. Civic Readiness Taskforce.
	§2.3.2(A)2	• Code.Org x2 • Axiotrop LLC. • @2 stakeholders • Google • The College Board • @4 educators • @1 member of the RI General Assembly	Support for the proposed computer science proficiency requirement	No Change – This comment is in support of the proposed regulatory language.

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		• @2 assistant superintendents • @1 stakeholder • @2 school counselors • @1 parent • @2 stakeholder • President of the R.I. School Counselor Association	Concern with proposed computer science proficiency requirement **1 Assistant superintendent requested RIDE define proficiency* **1 stakeholder requested RIDE replace computer science with technology*	No Change – RIDE recognizes computer science as essential for preparing students for success in the 21st century. * Related to implementation guidance, RIDE and partners will develop a definition of proficiency in computer science
		• @2 educators	Request that the proposed computer science requirement encompasses computer applications	No Change - This is related to implementation guidance. RIDE will consider this feedback as the computer science standards are finalized.
	§2.3.2(A)(3)	• @6 stakeholders • @5 educators • @1 school counselor • @1 member of the R.I. General Assembly • President of the RI School Superintendents Association • @1 parent • 360 High School Community Advisory Board	Support for proposed financial literacy requirement **Member of the RI General Assembly and @1 parent requested beginning financial literacy in middle school* **@1 stakeholder request pairing financial literacy as a .5 credit course with a .5 credit course of business/consumer math*	No Change – This comment is in support of the proposed regulatory language.
	§2.3.2	• @1 school counselor	Proposed 1/2 credit course that encompasses all three of the skills being proposed in §2.3.2 (Civics, Financial Literacy, Computer Science)	No Change – The proficiency requirements for civics and financial literacy are defined by R.I.G.L. § 16-22-2 and § 16-22-13 respectively.

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				RIDE also recognizes computer science as essential for preparing students for success in the 21st century.
	2.1(A)(11)	• Code.Org x2 • The College Board • @1 stakeholder	Replace "technology" with "computer science". This is consistent with the proposed update in 2.3.1.C.7 which also replaces "technology" with "computer science."	Change - This was an oversight; the final proposal will replace computer science with technology in all instances.
	§2.3.2(A)(1) §2.3.2(A)(2) §2.3.2(A)(3)	• @1 stakeholder	Opposition to computer science, civics, and financial literacy requirements noting it will restrict Career And Technical Education program enrollment	No Change – The proficiency requirements for civics and financial literacy are defined by R.I.G.L. § 16-22-2 and § 16-22-13 respectively. RIDE also recognizes computer science as essential for preparing students for success in the 21st century.
	General Comment: Real-World Relevant	• @1 principal	Concern with the term "real-world relevant" in that it implies other areas are not real-world or relevant	No Change - The proposal intends to connect high school learning experiences in every content area to the real-world relevant learning experiences of our students.
Physical Education/ Health Education	2.3.1(C)(7)	• RI Association for Health, Physical Education, Recreation and Dance • @9 educators • @1 University of RI staff/faculty • @2 stakeholders • @1 parent	Concern that the proposal impacts/impedes R.I.G.L. 16-22-4 state statute outlining the requirement for K-12 students to receive 100 minutes per week in physical education and health	Change – The final proposed regulatory language clarifies that Physical Education and Health standards shall include meeting all Physical Education and Health requirements enumerated in state statute (E.g., by R.I.G.L. § 16-22-4). Additionally, RIDE does not cite specific statutes, or regulatory documents in regulation.
		• @3 stakeholders • @2 educators • @1 member of the R.I.	Concern with Physical Education and Health "becoming electives"	Change – The final proposed regulatory language clarifies that Physical Education and Health

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		General Assembly • @1 parent		standards shall include meeting all Physical Education and Health requirements enumerated in state statute (E.g., by R.I.G.L. § 16-22-4). Additionally, RIDE does not cite specific statutes, or regulatory documents in regulation.
		• @1 educator	Requesting standalone credit requirements for Physical Education/Health	No Change - The final proposal will include more direct verbiage but will not separate the content areas from this section. RIDE understands separating these content areas may lead to a reduction in locally required credits.
	2.1(A)(11)	• @2 educators	Make physical education a core content area	Change – RIDE recognizes physical education and health as core content areas. Physical education and health will be included in the definition of core content areas in the secondary regulations.
Special Education	2.3.1(C) 2.3.1(C)(5) 2.3.1(C)(2)	• @2 parents • @2 teachers • Chair of Woonsocket Special Education Learning Advisory Committee x2	Concern that coursework alignment is not right for all students with IEPs/504 plans **1 parent and one teacher specifically mentioned this regarding world language.* **1 teacher specifically mentioned this regarding algebra II*	Change – All students will be expected to complete college and career-ready coursework with the option for a student to take alternate RIDE-approved readiness coursework as decided through an informed parental consent process.
	2.3.1(C)(8)	• Chair of Woonsocket Special Education Learning Advisory Committee x2	Concern with term “manifestation of disability” **Chair of Woonsocket Special Education Learning Advisory Committee requested a definition of this term.*	Change – This language will be removed from the final regulatory proposal.

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		• RI Special Education Advisory Committee		
		• Chair of Woonsocket Special Education Learning Advisory Committee x2 • RI Special Education Advisory Committee • RI Parent Information Network • 360 High School Community Advisory Board	Concern with language "has failed or is at risk of failing" **RI Special Education Advisory Committee recommends using current data, including transcripts and current evaluations, along with academic and functional performance to help identify appropriate supports for coursework and appropriate "Pathways" with detailed structure.* **RI Parent Information Network requests RIDE include language that LEAs must utilize data-informed instruction (meaningful assessment data that tells what students know, what students should know, and what students do not yet know) methodology in determining recommended coursework.*	Change – This language will be removed from the final regulatory proposal.
		• Chair of Woonsocket Special Education Learning Advisory Committee x2 • RI Special Education	Concern with the IEP team being responsible for determining if the student's struggles are a manifestation of their disability.	Change – This language will be removed from the final regulatory proposal.

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		Advisory Committee • Association of RI Administrators for Special Education		
		• Association of RI Administrators for Special Education	Concern that the availability of a "RIDE approved readiness pathway" for students with IEPs will lead to lower expectations for students with IEPs and create separate requirements for certain special education students.	Change – The final regulatory proposal will include revised regulatory language clarifying that the RIDE approved readiness pathway would be available to all students utilizing the informed parental consent process that do not complete college and career ready coursework.
		• Association of RI Administrators for Special Education	Remove the word "and" after "determine"	Change – This language will be removed from the final regulatory proposal.
		• @1 school counselor	Concern that "alternative readiness pathways" do not provide students with a "real diploma"	No Change – RIDE is committed to one diploma option for all students.
		• RI Parent Information Network	Amend to state "Every student shall be required to attempt the credit sequence stated in 2.3.12(C) and proficiency requirements stated in 2.3.2. If a student has an IEP, the IEP team will review relevant data and evaluations to determine whether the student's disability inhibits the student from completing the required credit sequence and proficiency requirements. Upon such a determination by the IEP team, and additionally with the approval of the student's parent/guardian, the LEA will make available to the student a RIDE-approved readiness pathway, which will substitute for the credits identified in 2.3.12(C) and proficiency requirements identified in 2.3.2.	Change – This language will be removed from the final regulatory proposal. The final regulatory language will clarify that the RIDE approved readiness pathway would be available to all students utilizing the informed parental consent process that do not complete college and career ready coursework.
	2.3.1(J)	• RI Parent Information Network	Amend to state "Students who achieve modified proficiency standards applied to credit 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	No Change – Students eligible for alternate assessment must still earn a diploma for graduation purposes and not be automatically granted one for graduation purposes.

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			Individualized Education Plan (IEP), must be awarded a diploma for graduation purposes.	Therefore, the language in this section will remain "may" not "must".
	2.3.7	• RI Special Education Advisory Committee • @1 parent • RI Parent Information Network	Recommend that RIDE include regulatory language to codify one recognized and approved diploma for all students	Change – RIDE recognizes the importance of one diploma for all students. All language related to certificates will be removed from the final regulatory proposal. Upon the adoption of the proposed regulatory language, LEAs will be unable to award certificates in lieu of a diploma.
	General Comment: Flexibility for students with IEPs and 504 plans	• RI Special Education Advisory Committee • @1 stakeholder	Allow for more flexibility, specifically regarding students with IEPs and 504 plans	Change – The final regulatory proposal will include revised regulatory language clarifying that the RIDE approved readiness pathway would be available to all students utilizing the informed parental consent process that do not complete college and career ready coursework.
Multilingual Learners	2.3.1(A)	• RI Teachers of English Language Learners representing 200+ RI multilingual learner educators x3 • TESOL International Association	If a Multilingual learner fails or is in danger of failing one of the required credits, their time in English language proficiency and years in schools in the United States should be reviewed to seek alternate RIDE-approved readiness pathways.	Change – The final regulatory proposal will include revised regulatory language clarifying that the RIDE approved readiness pathway would be available to all students utilizing the informed parental consent process that do not complete college and career ready coursework.

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		• RI Teachers of English Language Learners representing 200+ RI multilingual learner educators x3 • TESOL International Association	In a RI high school, if a SLIFE Multilingual learner fails or is in danger of failing one of the required graduation credits, instead of being denied graduation, their time in English language proficiency and years in schools in the United States should be reviewed to seek alternate RIDE-approved readiness pathways. The 20 courses/credit requirement for graduation should be reconsidered so that students can seek alternate RIDE-approved readiness pathways rather than denied graduation.	Change – The final regulatory proposal will include revised regulatory language clarifying that the RIDE approved readiness pathway would be available to all students utilizing the informed parental consent process that do not complete college and career ready coursework.
	General Comment: Aligning the proposal to multilingual learner best practice research - §2.3.1(C) §2.3.1(D) § 2.3.2 §4.3.1(D)	• RI Teachers of English Language Learners representing 200+ RI multilingual learner educators	Urging RIDE to consider ways to align the proposal with current research in best practices for multilingual learners including: 1. §2.3.1(C) Recommended addition: For multilingual students, credits in each area except ELA may be earned through work completed in a home language, if other than English. 2. §2.3.1(D) Recommended addition: For multilingual students, credits in dual-enrollment programs may be earned through work taught by an approved institution in a language other than English. 3. §2.3.2 Recommended addition: For multilingual students, credits in each area may be earned through work completed in a home language, if other than English. 4. §4.3.1(D) Recommended addition: For multilingual students, credits in each area except ELA may be earned through work completed in a home language, if other than English.	No Change – RIDE supports these four recommendations and has deemed them allowable via the current and proposed regulatory language.
	General Comment: Lack of reference to multilingual learners	• RI Teachers of English Language Learners representing 200+ RI multilingual learner educators x2	Multilingual learners are only mentioned 2 times throughout the proposal.	No change - Supports and services for multilingual learners are detailed in-depth in the Regulations Governing the Education of English Language Learners
	General Comment: Flexibility for multilingual learners	• RI Teachers of English Language Learners	If multilingual learners enter high school with a WIDE score of 2.5 or lower, or if SLIFE students enter high school with having missed	Change – The final regulatory proposal will include revised regulatory language clarifying that

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	and students with limited or interrupted formal education	representing 200+ RI multilingual learner x2	1 or more academic years of schooling, they should be entitled to accommodations to meet the graduation requirements.	the RIDE approved readiness pathway would be available to all students utilizing the informed parental consent process that do not complete college and career ready coursework.
Seat Time	§2.3.1(B)(2)	• Advocacy Co-Chair of RI Music Education Association x3	Concern that "RIDE is proposing to expand required "seat time"	No Change – RIDE's proposal does not propose to increase seat time.
		• Riverzedge Arts Education Director/Expanded Learning Opportunities Director	Support for proposed elimination of seat time as a graduation requirement	No Change – This comment is in support of the proposed regulatory language.
		• @1 stakeholder	Concern for lack of time frame and attendance requirements	No Change – Compulsory attendance is required via state statute.
College and Career Readiness Requirements (FAFSA & Resume)	2.3.3(A)	• @2 school counselors • @1 educator • @2 Young Voices student members • RI Teachers of English Language Learners representing 200+ RI multilingual learner educators x3 • RI KIDS COUNT • @1 school committee member • @2 parents • Woonsocket School Committee	Opposition to proposed FAFSA/State Aid requirement for graduation * RI Teachers of English Language Learners notes that the risk to the safety of undocumented students and families is too great to make §2.3.3(A) a graduation requirement. *RI KIDS COUNT is 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.	Change – Based upon public comment received the final regulatory proposal will include revised language related to the FAFSA.
		• President of R.I. Federation of Teachers • @1 school counselor • @1 superintendent	Concern with the proposed FAFSA/State Aid requirement for graduation	Change – Based upon public comment received the final regulatory proposal will include

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		• Chair of Woonsocket Special Education Learning Advisory Committee x2 • RI Center for Justice • President of the R.I. School Counselor Association	**Chair of* Woonsocket Special Education Learning Advisory Committee *recommends "may" change to "shall" in the proposed regulatory language re: districts may certify and/or apply for a waiver* **RI Center for Justice requests to amend this section as "Each graduating senior and their family shall receive support from district and school staff to complete steps toward a successful transition to postsecondary education and/or career training which may include but not be limited to:* *1. Complete and submit to the U.S. Department of Education a free* *application for Federal student aid; or* *2. Complete and submit to the Office of the Postsecondary Commissioner a* *free application for State student aid, or* *3. Complete a resume prior to high school graduation."* **President of the R.I. School Counselor Association cited several concerns with the proposed FAFSA/State Aid requirement and request that additional resources be provided if this does become a requirement as well as the option for an online waiver process.*	revised language related to the FAFSA.
		• RI Kids Count • Alliance of RI Southeast Asians for Education • Providence Student Union • Parents Leading for Educational Equity • Young Voices • Youth In Action • College Visions • Providence Youth Student Movement	Recommend replacing §2.3.3(A) with a requirement that each school district develop and obtain approval from RIDE for a policy of specific programmatic support for student and family completion of financial aid forms prior to graduation.	Change – Based upon public comment received the final regulatory proposal will include revised language related to the FAFSA.

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		• A Sweet Creation • Urban Debate League • Diversity Talks • National Association for the Advancement of Colored People • A Leadership Journey • Steam Box		
		• RI KIDS COUNT	Recommend the proposed regulations include additional resources to school districts so FAFSA completion efforts are staffed adequately and do not unintentionally contribute to inequities.	Change – Based upon public comment received the final regulatory proposal will include revised language related to the FAFSA.
		• RI KIDS COUNT x2	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.	No Change – The proposed regulation will take place for the Class of 2027 allowing at least 4 full FAFSA cycles to take place before the implementation of these requirements.
		• RI KIDS COUNT x2	Urge RIDE to require 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.	Change – Based upon public comment received the final regulatory proposal will include revised language related to the FAFSA.
	2.3.3(B)	• @1 educator • 360 High School Community Advisory Board	Support for proposed resume requirement	No Change – This comment is in support of proposed regulatory language.
Flex Credits	§2.3.1(C) §2.1(A)(20)	• Riverzedge Arts Education Director/ Expanded Learning Opportunities Director • Director of William M.	Support for encouraging districts to explore the use of “flex credits” to meet credit requirements	No Change – This comment is in support of proposed regulatory language.

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		Davies, Jr. Career & Technical High School • RI KIDS COUNT • 360 Community Advisory Board • The XQ Institute		
		• @2 representatives of Festival Ballet Providence	Set a minimum requirement of certification to ensure that the teacher(s) teaching the flex credit classes are certified to be "highly qualified" in both content areas	No Change – This is related to implementation guidance. The teaching of flex credits will be required to comply with educator certification regulations.
		• RI Federation of Teachers and Health Professionals (AFT AFL-CIO) representing 7,000 members	Urge RIDE to carefully craft "flex credits" to not disenfranchise any students	No Change – Flex credits will be used to empower students and increase engagement in real-world relevant learning.
		• @1 educator	Concern for the feasibility of the flex credits in conjunction with the high-quality curriculum mandate	No Change – Flex credits will be aligned to the RI Curriculum Legislation high quality curriculum requirements.
Supports for Students	§2.4.1(B)(2)	• The XQ Institute	Support for the regulatory language giving students new support to manage school and life	No Change - Comment in support of proposed regulatory language
	§2.4.1(B)(4)	• RI KIDS COUNT x2 • The XQ Institute	Support for the proposal that 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	No Change - Comment in support of proposed regulatory language
		• RI KIDS COUNT x2	Urge RIDE to strengthen the proposed regulatory language to **require** school districts to 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	No Change – The proposed regulatory language requires annual communication with parents on the academic progress their children are making towards college and career readiness benchmarks.
		• 360 High School	Cited difficulty keeping track of each student's plan for annual	No Change – Schools will be required

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		Community Advisory Board	notification	to establish a process for communicating and tracking communication to students and families.
Other Comments	General Comment: Independent living skills	• @1 social worker	Independent living skills should be a required transition skill development area for every student	No Change - Readiness-Based Graduation Requirements focus on preparing students to create their futures.
	General Comment: Foundational leveled courses	• @1 stakeholder	Regarding Students with IEPs and 504 plans - Allowing credits earned in foundational leveled classes in core subjects for credit toward a proficiency	No Change – Students should be offered credit for demonstrating mastery and competency in HS level coursework.
	General Comment: Replacement of "Course" with "Credit" throughout the regulation	• RI KIDS COUNT x2	Agreement with proposed revisions to strengthen competency-based learning in all school districts by changing the language from "course" requirements to "credit" requirements.	No Change- This comment is in support of the proposed regulatory language.
	General Comment: Timeline	• @1 superintendent	Concern for the proposed timeline being implementation for the "class of 2026"	No Change – The proposed timeline is for the class of 2027.
		• @1 stakeholder	Suggest implementation for a class earlier than 2027	No Change – Based on public feedback there would not be sufficient budget and staff planning time If the date for implementation were to be sooner than the class of 2027.
		• @1 school counselor	Concern for the implementation timeline being for the class of 2027 – suggesting it should be later	No Change – Based on public feedback, stakeholders believe that delaying implementation beyond the class of 2027 is too long to wait to implement these changes.
	General Comment: Guidance Counselor Ratios	• Executive Director of RI Association of School Principals	Request improving (decreasing) the student to guidance counselor ratio in RI schools	No Change- School counseling requirements are detailed in the Basic Education Program.

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	General Comment: Rethinking School Schedules	• @1 educator • RI School Superintendents Association Executive Board	Suggest rethinking/revision to school schedule	No Change – This is related to implementation guidance. Schools and districts currently have the ability to establish and revise school schedules. RIDE will provide scheduling support LEAs to ensure all school schedules are supporting college and career readiness.
	General Comment: Suggest RIDE follow Connecticut Model	• Advocacy Co-Chair RI Music Education Association	Suggest RIDE follow Connecticut 2017 Graduation Requirement revisions	No Change – RIDE has reviewed the Connecticut 2017 graduation requirement revisions and have adopted a proposal that is right for R.I.
	General Comment: Funding/Resources	• Chair of Woonsocket Special Education Learning Advisory Committee	Concern that districts lack the necessary fiscal resources to successfully implement the proposed changes	No Change – The regulatory language does not propose increasing the number of credits students are expected to graduate having completed.
	General Comment: These are minimum statewide requirements	• @1 assistant superintendent	These are the minimum requirements outlined by the states, districts can implement additional requirements.	No Change Requested
	General comment: ILP (Individual Learning Plan)	• @1 stakeholder	The ILP should be students' graduation requirements – inclusive of a career-track and college-track.	No Change - The ILP is a vital tool in ensuring students meet the requirements outlined in RIDE's proposal and ensuring their high school experience is aligned to their postsecondary goals.
		• @1 school counselor	RIDE should provide a free, optional, statewide implementation of the ILP	No Change – RIDE has issued a menu of RIDE-approved ILP Vendors.
	General comment: Internships	• @1 school committee member	Opposition to "requiring internships for all students"	

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				No Change – The regulatory language does not propose to require internships for all students.
	General comment: Diploma Plus Credentials §2.1(A)(15)	• @1 parent	Concern that the language re: diploma plus credentials is vague and vulnerable to scope increase	Change – The final regulatory proposal will include language intended to clarify that the revision relating to diploma plus credential is only meant to revitalize the meaning and value of diploma endorsements, not to change any expectation that students obtain these endorsements.
	General Comment: Business and Economics	• @1 educator	Concern with the lack of regulatory language mentioning business and economics	No Change – The proposal does not prevent students from participating in business and economic coursework offered at the local level.
	General Comment: Mental Health	• @2 members of the Parent Support Network of RI	General comment on the importance of increasing mental health supports for all students	No Change Requested.
	General Comment: Extending the length of high school	• @1 stakeholder	Request RIDE consider making high school a 4–6-year experience for all students	No Change - The proposal aims to increase connections to postsecondary education and career opportunities available to students upon graduation while they are still in high school.
	General Comment: Vocational Training	• @1 stakeholder	Recommends the return to offering vocational training	No Change – Readiness-Based Graduation Requirements support and provide opportunities for students to engage in Career and

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				Technical Education and work-based learning.
	General Comment: Local/Global sustainability	• @1 stakeholder	Concern with missing focus on local and global sustainability and solutions for the problems of our society/world	No Change - The proposal provides ample opportunity to connect students' high school experiences to real-world relevant learning experiences such as local and global sustainability.
	General Comment: Cost	• Bristol Warren Regional School Committee • RI Association of School Committees	Request that RIDE determine the cost to LEAs to implement the proposed graduation requirements and that all the K-12 council defer any and all action on the proposal until RIDE reports the cost to LEAs	No Change – The regulatory language does not propose increasing the number of credits students are expected to graduate having completed.
	General Comment: High Quality Curriculum	• @1 educator	Concern that the high-quality curriculum requirement impedes educator ability to utilize the concept of flex credits	No Change – Flex credits will be aligned to the RI Curriculum Legislation high quality curriculum requirements.
	2.1.(A)(28)	• @1 educator	Support for the definition of Work-Based learning being recognized for academic credit	No Change – This comment is in support of the proposed regulatory language.
	§2.1(A)2	• @1 social worker	Advocate that the RI Social Emotional Learning Standards are included	No Change – RIDE has endorsed SEL standards. SEL standards are also embedded throughout other content standards.
	§2.3.4	• @1 stakeholder • @1 parent	Remove the performance-based diploma assessment **1 stakeholder specifically recommends this for Students with IEPs and 505 plans*	No Change - The proposal expands the existing criteria for performance-based diploma assessments which will allow for work-based learning, community service, project-based learning, and other strategies that support applied learning to fulfil this requirement.

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	General Comment: Examine Conflicting Regulations/ Laws	• RI School Superintendents Association Executive Board	Suggest examination to ensure no conflicts will exist with the proposed revisions and current regulation and R.I.G.L.	No Change – RIDE is unaware of any conflicts that exist with the proposed revisions to the proposed regulatory language and R.I.G.L.
	General Comment: All Course Network §2.3.1.H §2.3.1.I	• RI KIDS COUNT x2	Support for the proposal to 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 and strong encouragement for school districts to allow the use of the ACN to meet graduation requirements.	No Change – This comment is in support of the proposed regulatory language.
		• President of R.I. Federation of Teachers	Urge RIDE to carefully craft as to not disenfranchise any students the proposed regulatory language that LEAs are "strongly encouraged to use the ACN to fulfill graduation requirements".	No Change -The ACN will be used to empower students and increase engagement in real-world relevant learning.
Full Proposal	General Comment: Full Proposal	• @4 stakeholders	Request to not change the statewide graduation requirements	No Change - RIDE is committed to improving the high school experience and believes these regulatory changes are the first step in the process.
		• Envision Technologies LLC • @1 parent • @2 stakeholders • @1 school administrator • @1 student • The XQ Institute	Support the proposal ** Envision Technologies Noted the need for increased flexibility to get educator certified*	No Change – This comment is in support of the proposed regulatory language.
		• @1 superintendent • Executive Director of RI Association of School Principals	Support the intent of the proposal to graduate students with open doors/choices	No Change – This comment is in support of the proposed regulatory language.

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		• @1 parent • @1 assistant superintendent • @1 stakeholder @1 parent member of the Parent Support Network of RI	Opposed to the proposal	No Change - RIDE is committed to improving the high school experience and believes these regulatory changes are the first step in the process.