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Council on Elementary and Secondary Education
255 Westminster Street
Providence, RI 02903

Subject: Endorsement of Regulation 200-RICR-20-05-6: Regulations Governing the Intervention and Support for Failing Schools

Dear Esteemed Members of the Council of Elementary and Secondary Education,

My name is Ramona Santos Torres, the Executive Director of Parents Leading for Educational Equity (PLEE), a grassroots family advocacy organization dedicated to ensuring a high-quality education for all students of color in Rhode Island. I am writing to express our support for Regulation 200-RICR-20-05-6, which delineates criteria and procedures for concluding the turnaround status of Local Education Agencies (LEAs) under the Crowley Act. Regulation 200-RICR-20-05-6 holds significant importance in bolstering accountability, transparency, and community involvement within the Rhode Island education system, crucial elements for enhancing educational outcomes across the state. While we support this regulation, we would like to bring attention to key aspects requiring further clarification.

In Section 6.4, the regulation emphasizes the importance of community and stakeholder input in shaping the progress of Local Education Agencies (LEAs). The regulation specifies that this progress should be influenced by insights gathered through community engagement, a process integral to creating the turnaround plan. The involvement of the community in decision-making is crucial for several reasons. Firstly, it ensures a diverse range of perspectives, incorporating the views of parents/caregivers, students, teachers and other stakeholders who have

a direct impact on the educational system. This diversity of input is valuable in capturing the varied needs and aspirations of the community. Moreover, community involvement fosters a sense of shared responsibility for the educational outcomes of the LEA. When the community actively participates in shaping the turnaround plan, it creates a collaborative environment where everyone feels invested in the success of the educational initiatives.

To operationalize this community engagement, it is essential to establish a clear and structured process for collecting and utilizing input. The process for collecting community input should be comprehensive and well-structured. It should include town hall meetings, surveys, focus groups, or other inclusive methods that allow all community members to contribute. By doing so, trust is built, collaboration is promoted, and the resulting turnaround plan becomes a true reflection of the nuanced needs and aspirations of the community. A transparent and inclusive process for gathering and utilizing community input not only enriches the decision-making process but also ensures that the turnaround plan is genuinely aligned with the unique needs and aspirations of the community the turnaround plan seeks to serve.

Additionally, we want to call attention to the capacity and readiness to continue to make progress on the academic and other progress as identified within section 6.4 line C. The clarity, transparency, equity focus, and community input embedded in the metrics used to assess Local Education Agencies (LEAs) under the Crowley Act are crucial elements for fostering a fair and effective way to assess LEAs readiness and provide a straightforward understanding of what is expected from an LEA. When the criteria for success are transparent and easily comprehensible, it promotes accountability and ensures that all stakeholders, including educators, parents, and students, are on the same page regarding the goals and expectations. When the criteria for evaluating an LEA's progress are openly communicated, it builds trust and confidence among the community and stakeholders. Transparency also allows for scrutiny and ensures that the assessment process is fair and unbiased.

An equity-focused approach in defining metrics is essential to address the diverse needs of students and communities. Metrics should go beyond traditional academic measures and encompass indicators that reflect the equitable distribution of resources, opportunities, and

support services among schools. This ensures that the assessment process acknowledges and addresses disparities, working towards a more inclusive anti racist educational system. Community input is invaluable in shaping metrics that resonate with the unique strengths and challenges of each local context. Including the perspectives of parents, teachers, students, and community members ensures that the metrics align with the community's values and aspirations. This collaborative approach not only enriches the evaluation process but also fosters a sense of shared responsibility for the educational outcomes. Non-academic progress measures may involve achieving milestones that address the root causes contributing to the LEA's turnaround status.

The readiness evaluation extends to the LEA's local school committee or board, ensuring they have the capacity to support continued progress, consistent with their responsibilities and governance best practices. Additionally, the legally responsible municipal entity's capacity and readiness are scrutinized to ensure support for the LEA's school committee or board and to contribute sufficient local funding necessary for sustained progress, in compliance with statutory maintenance of effort requirements.

We express our gratitude to the Rhode Island Department of Elementary and Secondary Education (RIDE) and the Council of Elementary and Secondary Education for their commitment to establishing a comprehensive and equitable framework under Regulation 200-RICR-20-05-6. The dedication to clarity, transparency, equity, and community engagement in the assessment of Local Education Agencies under the Crowley Act is encouraging. We believe that a thoughtful approach will not only enhance educational outcomes for all student but also foster a sense of shared responsibility and collaboration within our communities.

Sincerely,
Ramona Santos Torres
Executive Director
Parents Leading for Educational Equity (PLEE)