



Commission to Study the Educational Outcomes of Children in State Care

Date of Meeting: September 15, 2025

RE: Consolidated Follow-Up Questions

Consolidated Follow-Up Questions and Concerns on RIDE Attendance and Academic Achievement Guidance

I. Foundational and Legal Framework

- **Definitions:** Please provide clear definitions of truancy and excused absences.
 - Truancy - RIDE operates on and has adopted the federal definition of truancy.
 - Excused absences - This is not a category of absence or information that is germane to RIDE at the State or the U.S. Department of Education (ED) at the federal level. Policies and procedures around excused or unexcused absences are determined at the district/local education agency (LEA) level, and excused absences *still count* as absences for local, state, and federal data collections. Additionally, this is not a germane category because the focus is on missed instructional time.
- **Appeals Process:** What are the specific timelines for appeals, and how will families navigate the appeal process during summer months (late June–August)?
 - Please see page ten (10) of the *Attendance and Academic Achievement* Guidance Document, which outlines the process for appeals.
- **Public Input:** Could you elaborate how the guidelines were developed without public comment?
 - In brief, the guidance document is not regulatory in nature and therefore does not necessitate a formal public comment process. However, the guidance document in fact was informed by over four months of public engagement and consultation, first by the Statewide Chronic Absenteeism Working Group, then with intergovernmental partners across the State of Rhode Island, and then by interested stakeholder groups. Additionally, RIDE socialized this guidance with superintendents and principals through traditional channels, as well as with education researchers at both Brown and Harvard University.

II. Foster Care, Vulnerable Populations, and Equity

- **Foster Youth:**
 - How does the guidance account for excused absences?



- Please see the response above regarding excused absences. The guidance does not account for excused absences because in data collections, an absence remains an absence, regardless of the reason.
- Please elaborate on the definition of “family,” and how DCYF is notified of any attendance issue?
 - The term “family” is used both capaciously and colloquially in the guidance document to encompass anyone who cares deeply about the outcomes of the child in question and carries a degree of responsibility for the child. Of the eight mentions of the word “family” it is most often accompanied by additional qualifying language such as “parents” or “guardians.” Unfortunately, RIDE is not able to readily speak to whether or not an LEA notifies DCYF of an attendance issue for youth in foster settings.
- How are retention decisions managed when placements change mid-year?
 - In general, this is a question that contemplates LEA-level policies and decision making; RIDE is not in a position to opine on how LEAs manage intake, registration, and placement. However, generally speaking, if a student’s placement in either a school or a home setting changes mid-year, the grade of record within which the student is enrolled when the placement change occurs should remain the same. But, if the receiving school reviews the credits accrued, course completions, or associated competencies at the high school level and has substantive concerns or questions, the LEA and its school retain the ability to make a different grade level determination.
- Will child welfare representatives, CASA volunteers, and educational advocates be formally included in team reviews?
 - Please see page nine (9) of the *Attendance and Academic Achievement Guidance Document*, which states: *“For these students, LEAs must collaborate with child welfare representatives, educational advocates, and caregivers in order to ensure that all supports have been explored—and that retention is in the student’s long-term best interest.”*
- **Demographics:**
 - Can RIDE provide demographic analyses of the youth served by the program, including how outcomes may differ across diverse populations within the foster care system?
 - RIDE is not certain what program is being referenced here.



III. Legal, Court, and Child Welfare Integration

- **Court System:** How will court involvement be factored into retention decisions?
 - In accordance with the Guidance’s call for LEAs to revisit and revise policies related to retention, LEAs would have the latitude to determine how, if at all, the courts can or should be involved in retention decisions.
- **Child Welfare Collaboration:** What does “heightened scrutiny” mean in practice for foster youth? Will child welfare representatives and advocates always be included in team decisions?
 - In the context of foster youth / youth in care, we recognize that students often face significant disruptions to their education, including placement changes, trauma, and inconsistent access to academic supports. As such, attendance and academic achievement data may reflect systemic barriers the student is facing. With that context in mind, RIDE understands it is important for LEAs to give due and careful attention to decisions regarding retention - retention should not be used as a default response to instability; however, due to the academic and social impact of instability, retention may, in fact, be in the student’s best interest.
 - It is the responsibility of LEAs to collaborate with child welfare representatives, advocates, and caregivers to ensure all supports have been explored for the student’s long-term best interest.
- **Notification:** Will child welfare representatives and advocates also receive “Promotion in Doubt” letters?
 - It is the responsibility of LEAs to collaborate with child welfare representatives, advocates, and caregivers and ensure open channels of communication.

IV. Policy Logic and Implementation Gaps

- **If Retention Fails:** What happens if a student is retained but does not improve in academics or attendance?
 - Intervention supports should be explored at the school and district level to best support the student.
- **Role of School Personnel:** How will school psychologists, social workers, and nurses be included in the students wellbeing?
 - School support professionals, in the main, support student wellbeing. They inform policies, programs and practices related to student wellbeing for all students, for groups of students in need of additional support and individual student needs as



necessary and appropriate. The extent to which these professionals can support is determined locally. Ideally schools would be able to hire enough school support professionals to meet the needs within each school and across the district.

- **Individualized Learning Plans (ILPs):**

- What are the required components, timelines, and review standards?
 - It is the expectation that all middle and high schools will have either adopted an ILP system from the state-vetted menu or developed their own ILP system and curriculum model that meets the state's expectations. ILPs are student-directed planning and monitoring tools that customize learning opportunities throughout students' secondary school experience, broaden their perspectives, and support attainment of goals. ILPs document students' interests, needs, supports, course selections, transition placements, and other learning experiences both in and out of school. This information produces a thoughtful program of study leading to proficiency for graduation and postsecondary experiences. A meaningful ILP for all Rhode Island students:
 - Begins no later than entry into sixth grade and is maintained through 12th grade.
 - Is revisited at least twice each school year, and at key transition periods for students.
 - Helps students identify and meet their goals in three domains: academic, career, and personal/social.
 - Coordinates with other support plans as appropriate. For example, individualized education programs (IEPs), Section 504 plans, Personal Literacy Plans, etc.
 - Who has final approval authority?
 - Districts are required to define the roles of all involved adult stakeholders and students in the ILP program and to provide training and guidance to district and school staff regarding their roles within the ILP program. District ILP and counseling staff as well as school counselors will most likely drive the day-to-day operation of the ILP program; however, many stakeholders should contribute to the program development, implementation and the school-level ILP process itself. For more guidance on suggested roles for the ILP, please see the [Rhode Island Individual Learning Plan Development and Implementation Toolkit](#).



- How will ILPs align with existing IEPs, 504 plans, and PLPs?
 - A meaningful ILP coordinates with other support plans as appropriate, including IEPs, 504 plans, and Personal Literacy Plans. More detailed information regarding ILPs can be found on the RIDE website's [School Counseling page](#).
- **Multi-Tiered System of Supports (MTSS):**
 - Do all LEAs have MTSS frameworks, and are services consistent statewide? What
 - MTSS is a framework and process to identify academic and social-emotional interventions for all students. The framework is consistent. Practices within the framework will vary from school to school.
 - When an intervention is needed for a student, it may take the form of something that occurs within a scheduled class or outside of scheduled classes. They are not necessarily “services” as included in the question.
 - What defines “exhaustion” of interventions before retention is considered?
 - Most simply, it means that all schools in Rhode Island should implement every tool they have prior to considering retention for a student.

V. Data, Oversight, and Accountability

- **Data Collection and Reporting:**
 - How will RIDE collect retention data and how often will RIDE report on it?
 - RIDE collects retention data annually and publicly reports that data annually. The agency has done so since at least 2008–09 and will continue this practice.
 - To whom will RIDE report the data to?
 - As aforementioned, the data is reported publicly and available transparently to the public via RIDE’s website.
- **Population Estimates:** Commissioner Infante-Green referenced “3,000 students” affected. How was this figure calculated?
 - For school year 2024-25, approximately 3,000 students (specifically 2,973) were both chronically absent and scored a Level-1 (“Not Meeting Expectations”) on both RICAS ELA and RICAS Math.
- **Outcome Tracking:**
 - What benchmarks will measure policy effectiveness (e.g., graduation rates, long-term academic outcomes)?



- RIDE encourages LEAs to consider various student outcomes in determining the effectiveness of their policies at the local level. For examples of state-level outcomes, please visit [RIDE's report card page](#).
- What thresholds will trigger policy revision, and how will it be publicly reported?
 - Policy revision would occur at the Local Education Agency level.

VI. Parent and Student Engagement

- **Parental Rights:** Beyond “consultation,” what formal requirements exist for parent participation in ILP development?
 - Per RIDE’s 2020 ILP Implementation Toolkit, “*Districts are required to establish a process for families to access and review student ILPs and to notify parents on an annual basis regarding how to access the ILPs.*” Though not required, RIDE encourages schools and districts to require parents to review and approve students’ ILPs on an annual basis, provide families with a syllabus outline, by grade level, of the ILP activities students will be participating in, including conversation starters for how families can support these activities, develop ILP homework activities that students are directed to complete at home in collaboration with their parents and implement annual student-led parent-teacher conferences at which students present their ILPs, including their goals and plans for achieving the goals. More detailed information regarding ILPs can be found on the RIDE website’s [School Counseling page](#).
- **Communication:**
 - Will parents receive formal written notifications with timelines, comparable to special education processes?
 - The timelines for special education processes are established in federal law, federal regulations, and mirrored in RI state regulations. The ILP is embedded in the Secondary School and Graduation Requirement Regulations. More detailed information regarding ILPs can be found on the RIDE website’s [School Counseling page](#).
 - District-specific timelines will be determined at the Local Education Agency level.
 - How will language access be ensured for all communications and meetings?
 - RIDE provides interpretation and translation of documents as needed/requested.
 - At the local level, this process is determined by the local education agency.



- Could RIDE revise the “Promotion in Doubt” letter to use strengths-based language, particularly for families involved with child welfare or behavioral health systems?
 - RIDE provided a “Promotion in Doubt” letter template for use at the Local Education Agency level, where the language may be tailored to their specific needs and school communities.
- **Student Voice:** How will RIDE include the perspectives of current and former students who have experienced retention in policy evaluation?
 - RIDE has various avenues for engaging with students in Rhode Island’s public schools, including the Student Advisory Council where various policy topics may be brought to the monthly agenda.