



THE STATE EDUCATION DEPARTMENT / THE UNIVERSITY OF THE STATE OF NEW YORK

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April 25, 2019

Mr. Van Henri White, President
Board of Education
Rochester City School District
131 West Broad Street
Rochester, NY 14614

RE: Response to Distinguished Educator Report

Dear Mr. White:

In August 2018, in accordance with Education Law §§211-b and 211-c and Commissioner's Regulations §§100.16 and 100.17, Dr. Jaime Aquino was appointed as Distinguished Educator (DE) to support the Rochester City School District (RCSD or "the District") in improving its systems, structures, and operations and in addressing persistent and significant gaps in student services and academic performance.

In November 2018, Dr. Aquino submitted a report to the New York State Education Department (NYSED or "the Department") to which you were asked to provide a response. In February 2019, the District submitted its action plan ("Plan") in response to the recommendations contained in Dr. Aquino's report. I want to express my appreciation to the entire Board of Education ("Board") for its efforts in preparing a response to the DE's recommendations.

On March 8, 2019, the Department provided the District with a list of general concerns related to the District's Plan. With this communication, the Department is providing the District more detailed feedback on the action items described within the RCSD Plan.

Some elements within the Plan were responsive to the DE's recommendations. The Department would like to recognize that the District's Plan included the following important elements:

- RCSD sets forth a framework for setting appropriate academic standards regarding English Language Learners, including but not limited to stakeholder engagement and interpretation/translation for parents/guardians and professional development for teachers.
- RCSD put forth a plan to evaluate and adopt a uniform curriculum.
- RCSD has contracted with the local BOCES to evaluate curricular alignment in K-2 and will engage the Curriculum Council to review the audit results and determine an implementation plan by April 2019.

- RCSD put forth a plan to inventory available materials for classrooms by May 2019.
- In developing a comprehensive professional development program to help central office, teachers, paraprofessionals, and support staff better meet the needs of students, RCSD outlined explicit deliverables and dates by which the professional development will be completed, which may be used to measure progress.

Despite these positive elements, the Plan is problematic because it does not include an overarching, coherent vision for District improvement nor does it include a delineation of the priorities for the District's path forward. Within the Plan, the District often does not fully address Dr. Aquino's recommendations. Additionally, the Plan lacks specificity, and/or appears unrealistic in terms of either timelines and/or current District capacity to implement the actions effectively. Overall, the timelines appear aspirational, especially given that the District's leadership is in transition. While some of the actions described in the Plan may lead to improvement in specific areas, the Plan lacks the cohesiveness needed to drive systemwide increases in effectiveness and efficiency.

The attached table delineates the Department's concerns and comments related to the Plan. When addressing these concerns and comments in the revised plan, please follow these steps:

1. Indicate in the rightmost column of the enclosed table the pages in the revised Plan where the revisions may be found.
2. Track changes and highlight changes in yellow in the revised plan.

The District will have six weeks to work with Dr. Aquino to revise and resubmit its Plan. The revised Plan should be redlined, address all the recommendations made in the November 2018 DE report, and provide any requested additional information requested in the attachment. In all aspects of the Plan, I urge you to be specific about intended outcomes and expected dates of completion where relevant. In addition, the District must add to its revised Plan sections that contain:

- A statement of its overarching vision for improving student achievement;
- A statement of how the District's operational and financial functions will align their work as part of the vision for student achievement;
- A list of priorities and a realistic timeline of key interim and completion milestones for implementation;
- An explanation of how senior District leadership will organize their roles and responsibilities to monitor and evaluate implementation of the Plan across Departments;
- An explanation of the process and frequency by which the district will report to the public on progress; and
- A description of how the District provided opportunities for stakeholders to provide input on revisions to the Plan and a description of how stakeholders will be able to provide feedback on its implementation.

In addition, the conclusions and recommendations in the State Attorney General and NYSED Joint Report on the Investigation into the Death of Trevyan Rowe should be reviewed and incorporated into the revised Plan to the extent possible.

RCSD must resubmit its Plan to me for review no later than 5:00 PM on June 6, 2019. The Department will review the revised Plan and inform the District if further information is needed.

We look forward to continuing to work with you to ensure that the students of the Rochester City School District receive the education they need and deserve.

Sincerely,



MaryEllen Elia
Commissioner

Enclosure

cc: Rochester City School District Board of Education
Daniel G. Lowengard
Jaime Aquino
Beth Berlin
Alison Bianchi
Ira Schwartz
Kim Wilkins

**Rochester City School District
SED Staff Review of District Response to Distinguished Educator Report**

Section	NYSED Comments & Questions for RCSD	Rochester City School District Response ^{1,2}
Governance & Leadership, Section 1	<p>In regard to ensuring that the Board has a clear understanding of its role as a governing body:</p> <ul style="list-style-type: none"> • The RCSD Plan minimally addresses the recommendations made by the DE but requires additional information, as the District does not have in place a full District senior leadership and is not expected to have a Superintendent in place by June. While the DE recommended ongoing professional development (PD) for the Board in five areas, RCSD has only planned for six sessions (retreat or work study sessions), as well as the recording and archiving of PD sessions. Archiving provides documentation but does not monitor growth, learning, and implementation. • The attempt to address the scope of PD via the topics outlined and facilitated by the New York State School Board Association (NYSSBA) during a 90-day time frame is very ambitious, as PD needs to be planned with a deliberate focus on specific areas of significant need and may require the span of the school year with a scope and sequence for follow-up and continued training. RCSD should identify specific actions to address how this will be ensured. • The District should include a PD project management timeline as well as a description of how the Board will put its learnings into practice. • The District should define and articulate goals that align actions to its mission/vision statement and identify the process the Board will develop and implement for decision making, detailing how the district will document decisions made by the 	

¹ Please indicate the pages in each document where the revisions requested can be found. Additionally, please track changes and highlight changes in the revised plan in yellow.

² Note that responses to NYSED comments and questions need not be made within the same section of the report in which the comments are questions are provided. It may be appropriate to respond to a comment within a different section of the report or by reference to new sections of the report, such as the list of priorities with timelines. In some cases, the District may be able to reference multiple comments through a single response. In other cases, the District may wish to reference multiple sections of a report as responding to a single comment.

Section	NYSED Comments & Questions for RCSD	Rochester City School District Response ²
	<p>Board and how new Board Commissioners will be trained to ensure sustainability of the process.</p> <ul style="list-style-type: none"> • The District Plan must also address the following: <ul style="list-style-type: none"> ○ How will RCSD obtain quality PD for Board Commissioners? ○ What are the expectations for Commissioners who do not participate and engage in scheduled PD? ○ How will the Board involve stakeholders in developing such goals and expectations and communicate its understanding of its role as a governing body to the public? 	
Governance & Leadership, Section 2	<p>With regard to ensuring that the Board prioritizes improving student achievement:</p> <ul style="list-style-type: none"> • The Plan needs to be more specific on what strategies will be used by the Board to ensure effective plan implementation. The District should describe how the Board can support effective completion of this work, considering that there is currently an Interim Superintendent and four Board Commissioners up for re-election this year. • While the District intends to assess progress annually against strategic goals for the purpose of developing leading and lagging indicators, it is recommended that these assessments be conducted every five weeks to be aligned with the structure of reporting student progress to parents. • The District states that by June 2019 it will develop a system to review the budget proposal to ensure that it supports the strategic plan. However, the Plan also indicates that the strategic plan is a work in progress and needs further work to become a viable document. Therefore, the District needs to update its strategic plan in order to address this action item and should develop a timeline and process for doing so. • The District must also address the following: <ul style="list-style-type: none"> ○ What is the Board’s vision and strategy for improving student outcomes? ○ How will the Board organize its agendas and discussions to maintain the focus on a vision and strategy for improving student outcomes? ○ How will the Board work to ensure that its financial and operational decisions are focused on improvement of student outcomes? 	

Section	NYSED Comments & Questions for RCSD	Rochester City School District Response ²
	<ul style="list-style-type: none"> ○ What is the plan for involving stakeholders in updating the District’s strategic plan? 	
Governance & Leadership, Section 3	<p>Regarding implementing a system by which the Board holds the Superintendent accountable:</p> <ul style="list-style-type: none"> ● The District should include documentation of both Board and Superintendent goals and set (at minimum) quarterly evaluation intervals for these goals. The Board intends to schedule bi-weekly and monthly meetings. Agendas, data and outcomes should be documented to provide a tool for measuring goal attainment. ● In revising its Plan, the District should consider the following: <ul style="list-style-type: none"> ○ Is holding bi-weekly supervision meetings of the Board officers and Superintendent, as well as monthly meetings with 1-2 Board Commissioners efficient? Can efficiency and effectiveness be achieved through reduction in the number of such meetings? 	
Governance & Leadership, Section 4	<p>It is recommended that the Board include in its schedule a New Board Commissioners Seminar, as there will potentially be four new Board Commissioners elected this year.</p> <p>While the District and Interim Superintendent will begin to research, review, and select best practices related to scheduling Board meetings, the District will need to revisit these efforts once a new Superintendent is appointed.</p>	
Governance & Leadership, Section 5	<p>To address the implementation of a system of induction for new Board Commissioners, one of the District’s action items is to schedule an orientation session for newly elected Board Commissioners within two weeks of swearing in, which would be no later than February 2020. The District should establish policies regarding the timelines for swearing in and induction of new Board Commissioners.</p>	
Governance & Leadership, Section 9	<p>Addressed above in Section 2 – the District notes in its response that it will review, revise, and update the strategic plan and revisit it every three years. However, the plan also indicates this review will occur “annually, July.” Please revise to clarify when the plan will be revisited.</p> <p>The District should address how it intends to enact a five-year strategic plan when the current strategic plan is considered a “work in progress”</p>	

Section	NYSED Comments & Questions for RCSD	Rochester City School District Response ¹²
Governance & Leadership, Section 12	When promoting a culture of respect, trust, and collaboration that focuses on the students' best interest, the District has committed to assess the current whistleblowing hotline for its effectiveness in allowing employees to provide open and honest feedback without fear of retaliation.	
Governance & Leadership, Section 13	<p>In regard to building the Superintendent's relational capital with school administrators and teachers and increasing the Superintendent's presence in the schools, it is recommended that opportunities for open communication and feedback from all teachers and staff be connected to the District communication plans and processes.</p> <p>Additionally, after conducting school visits and holding the proposed meetings, the Superintendent should submit to the Board a monthly log of schools visited, the dates of the visit, the purpose of the visit, an assessment of whether the school's instructional practices are aligned with District policy, and any feedback provided to the school and/or next steps identified.</p>	
Teaching & Learning, Section 1	<p>While RCSD has addressed the DE's recommendations in regard to creating and implementing a vision of best first instruction, including differentiation, to support and enhance the learning of all students, the District is vague in its implementation plan.</p> <p>When structuring its response around an evaluation of the Danielson Framework for teaching, the District restated the DE's recommendations and submitted a timeframe by which to address the recommendations, essentially outlining a plan to plan.</p> <p>Therefore, prior to each target date, the District should provide additional details regarding the District's analysis and its action items. The DE recommends that common planning time be built into the master schedule. Therefore, the District should implement an accountability system to track and assess the use of planning time, as well as provide details on how it will ensure the quality use of common planning time.</p> <p>It is expected that by the end of the calendar year, RCSD will have a more developed plan, which includes the District staff responsible for each action.</p>	

Section	NYSED Comments & Questions for RCSD	Rochester City School District Response ¹²
Teaching & Learning, Section 2	<p>When addressing the adoption of a common curriculum in all subject areas, the District indicates that it will review and evaluate all curricular disciplines.</p> <p>However, the Plan outlines a textbook adoption priority schedule that includes English language arts and social studies but does not include mathematics or science materials. The District must provide more information on how curriculum will be selected for mathematics and science.</p>	
Teaching & Learning, Section 3	<p>In order to review the K-2 curriculum to determine its alignment to State standards, its quality, and the plan for implementation, RCSD contracted with BOCES to evaluate its curricular alignment in K-2 and will engage the Curriculum Council to review the audit results and determine an implementation plan by April 2019.</p> <p>It is recommended that the District include in its action plan an item to address any necessary changes identified by the BOCES review.</p> <p>In addition, the District should utilize a community-based approach to address this recommendation and engage partners with expertise in curricular alignment to assist in addressing this recommendation. When revising its Plan, the District should also clarify the following:</p> <ul style="list-style-type: none"> • Which BOCES will conduct the review and what does the contract entail? • Will the BOCES make recommendations as a result of the alignment review? • Will the District be using community-based partners with expertise in early childhood and the continuum from K-2 to assist the BOCES? If so, which community-based partners will the District utilize? 	
Teaching & Learning, Section 4	<p>In addressing the recommendation to develop a clear theory of action to show how the instructional vision and common curriculum will improve District-wide academic performance for all students, RCSD states that its Directors of Teaching and Learning, Chiefs of Schools, and the Office of Innovation will work in concert to develop by June 2019 a theory of action based on research from The Wallace Foundation and the University of Washington.</p>	

Section	NYSED Comments & Questions for RCSD	Rochester City School District Response ¹²
Teaching & Learning, Section 5	<p>In developing a tiered system of universal, strategic, and intensive interventions for all schools and in differentiating support within Receivership Schools, RCSD intends to investigate the existing Response to Intervention (Rtl) programs available in each school and determine the effectiveness of each.</p> <p>Although the DE's recommendation clearly states that the plan should be universal across all schools, including those in receivership, RCSD does not indicate that it will evaluate various Rtl programs and implement a uniform system across the District.</p> <p>Regardless of current student performance levels, all schools should have an Rtl system in place. Therefore, when revising the Plan, the District should explain why there is a need for a waiver process regarding Rtl.</p>	
Teaching & Learning, Section 6	<p>In regard to developing a systematized process for curriculum selection and interventions by developing and implementing a coherent, aligned instructional framework, RCSD indicates that by September 2019 it will have a process in place for adopting/adapting a P-2 Curriculum.</p> <p>The District should include action items to:</p> <ul style="list-style-type: none"> • Ensure a vertical articulation of P-2 and 3-8 selection of materials, and • Continually assess the progress and adequacy of its process design beginning in September 2019. 	
Teaching & Learning, Section 7	<p>When addressing the recommendation to implement a system to ensure that students have all materials needed to engage in the learning process, RCSD indicated it will use a checklist of mandated classroom materials and that by June 2019 RSCD will have in place a policy to encourage schools to allow students to take materials home for continued learning.</p> <p>The District should monitor whether the checklists are completed, so that by mid-summer RSCD can identify the buildings requiring additional classroom resources.</p>	

Section	NYSED Comments & Questions for RCSD	Rochester City School District Response ¹²
	When revising the Plan, the District should clarify the methods it will use to encourage schools to allow students to take materials home for continued learning.	
Teaching & Learning, Section 8	<p>When addressing the recommendation to clearly define what “culturally responsive teaching” looks like and how it will be monitored, RCSD indicates PD will occur within a communication and implementation plan. However, ongoing PD should be the basis for addressing this recommendation and should expand beyond the dates indicated.</p> <p>In addition to using NYSED’s definition of equity as a resource, the District would benefit from adapting or adopting NYSED’s <u>draft definition of and framework for Culturally Responsive-Sustaining (CR-S) Education</u>, as this definition has been concretized through multiple guidelines that name specific actions educators might take towards achieving CR-S, across stakeholder groups.</p> <p>The Plan may be strengthened by also addressing the following:</p> <ul style="list-style-type: none"> • What criteria will the District use to measure CR-S (e.g., review of lesson plans/student work, classroom walkthroughs, teacher feedback, student feedback)? For example, the action plan currently states that RCSD will review lesson plans and student work for evidence of the following: <ol style="list-style-type: none"> 1. Differentiated instruction; 2. Assessments reflective of “other way of knowing;” and 3. Culturally responsive literature • What other explicit criteria will the District look for when assessing and monitoring lesson plans and student work? • Are there strategies that the District is planning to use to incentivize teachers and leaders to implement CR-S strategies? • Is the District considering particular actions to ensure that teachers and leaders implement CR-S strategies? 	
Teaching & Learning, Section 9	The DE’s recommendation is to establish Instructional Leadership Teams (ILTs) at each school. However, the District includes an action item for developing a waiver process for schools that meet certain conditions that are pre-established by the Office of Accountability.	

Section	NYSED Comments & Questions for RCSD	Rochester City School District Response ¹²
	<p>The accountability status of a school should not determine the need for an ILT, the establishment of which is typically best practice in any building. Therefore, the District should explain why it will develop a waiver process for the establishment of ILTs.</p>	
<p>Teaching & Learning, Section 10</p>	<p>It is recommended that the District create a summary of each action item indicated within this section. Further, the District should create a protocol whereby the Superintendent and Cabinet undertake a 30-calendar day review upon completion of each action item. The Superintendent and Cabinet will review and evaluate the summary and prepare feedback for each action item. The District should also schedule regular updates to the Board.</p> <p>The District should strengthen its Plan by adding the following to its response:</p> <ol style="list-style-type: none"> 1. Contact information for the District Data Coordinator or District Data Administrator. Please see the Guidance on the Role of District Data Coordinator on Page 12 of the <u>SIRS Manual</u>. 2. Data Collection Protocol document. 3. A plan for utilization of Data Verification Reports by staff (during in-service and mandatory training) to focus on data-informed decision making at the classroom and school level. 4. A description of Cabinet use of school-level data to align and set trends for District-level instructional improvement goals and leadership practices. 	
<p>Special Education, Section 1</p>	<p>Under the heading of Persons Responsible, the District should specify the person(s) within the Office of Special Education responsible for this aspect of the Plan.</p>	
<p>Special Education, Section 2</p>	<p>Regarding having the Superintendent play a more active role in monitoring the Office of Special Education, RCSD's response provided enough information to be minimally sufficient. Since there is no Consent Decree, reference to such should be removed from the document.</p>	
<p>Special Education, Section 3</p>	<p>In regard to ensuring that all staff take collective responsibility for educating special education students, the District's first action item, "Monitor for evidence that students have access to grade-level content, materials, and resources," lacks specificity.</p>	

Section	NYSED Comments & Questions for RCSD	Rochester City School District Response ¹²
	<p>This action item should include an assurance that all special classes have been monitored as the District has historically been deficient in providing grade level materials and scheduling grade level meetings.</p> <p>In its Plan, RCSD provides information on how principals will ensure that special education teachers are providing grade level instruction aligned to the appropriate NYS Learning Standards.</p> <p>To strengthen its Plan, the District should address the following:</p> <ul style="list-style-type: none"> • What timeframe does RCSD propose for ensuring students have access to grade-level content, materials, and resources? • What evidence will RCSD use to determine whether students have access to grade level content, materials, and resources? • What processes and resources will RCSD have in place to improve such access if it is found to be lacking? 	
Special Education, Section 4	<p>When addressing the recommendation to ensure that the Special Education Department is supported, resourced, and held accountable for the District's implementation of the Special Education Strategic Action Plan, RCSD's response provided enough information to be minimally sufficient.</p> <p>All references to the "Consent Decree" and the Empire Justice Center should be removed.</p> <p>Also, under the heading of Persons Responsible, the District should specify the person(s) within the Office of Special Education responsible for this aspect of the Plan.</p>	
Special Education, Section 5	<p>The DE included a recommendation to provide written guidelines and training to schools regarding when it is appropriate for a student to be assigned to a one-to-one bus. Please provide additional information on how the District will implement this recommendation.</p> <p>Also, under the heading of Persons Responsible, the District should specify the person(s) within the Office of Special Education responsible for this aspect of the Plan.</p>	

Section	NYSED Comments & Questions for RCSD	Rochester City School District Response¹²
Special Education, Section 6	<p>In regard to providing ongoing professional development to the Committee on Special Education (CSE), RCSD included a link to their Action Plan, but the Plan does not specifically include all the PD topics that will be provided to the CSEs on a bi-weekly basis, as included in RCSD's response.</p> <p>RCSD needs to include in its Plan the schedule of specific dates and topics of the PD sessions so that monitoring of implementation can occur.</p> <p>Additionally, under the heading of Persons Responsible, RCSD included the "Deputy Superintendent of Teaching and Learning and the Office of Special Education." This statement should be clarified to include any additional persons in the Office of Special Education who are responsible for implementation of the plan.</p>	
Special Education, Section 7	<p>The District has described the creation of a Chief of Special Education position. Please provide additional information on when this position will be filled.</p>	
English Language Learners, Section 1	<p>In regard to developing a Master Plan (Handbook) for the education of English Language Learners (ELLs), the District should include the Regional Bilingual Education Resource Network (RBERN) on the ELL Handbook Committee, and the RBERN should also be listed among the Resources Needed. Additionally, Ray Giamartino, the District's Chief Accountability Officer, should be added to the list of Responsible Person(s).</p> <p>Additionally, the District should add an action item to ensure accountability for effective implementation of the Plan's steps.</p>	
English Language Learners, Section 2	<p>The District must add an action item to ensure that school site staff are aware of and utilize the available interpretation and translation services when working with parents/guardians with language needs.</p> <p>The District must also add an action item to ensure that parents/guardians are notified (in a language they understand) of the interpretation and translation services.</p>	

Section	NYSED Comments & Questions for RCSD	Rochester City School District Response ¹²
English Language Learners, Section 3	<p>In regard to setting ambitious and achievable expectations for ELLs and monitoring their academic progress, more details need to be provided on how this action will be implemented so that monitoring can occur.</p> <p>The District should conduct and incorporate an instructional needs assessment and should also complete the NYSED Office of Bilingual Education and World Languages' (OBEWL) ELL Quality Review Toolkit, which will allow the district to self-assess its regulatory compliance and implementation of best practices. The District must articulate how it will use data to inform instruction and PD offerings.</p> <p>The District must also articulate how it will consider the unique needs of subgroups within the ELL population (e.g., Students with Interrupted/Inconsistent Formal Education, ELLs with Individualized Education Programs) as well as needs based on years identified as an ELL (e.g., Newcomer, Developing, Long-Term).</p> <p>The District should add an action item on how it will conduct parent/caregiver outreach to ensure parents/caregivers understand both the district's expectations for ELL's and how their progress will be monitored.</p> <p>Additionally, the District should replace the term "seminars" with "professional learning opportunities," as this encompass a broader array of professional development opportunities.</p>	
English Language Learners, Section 4	<p>In regard to providing a coherent, instructionally aligned curriculum system for ELLs, more details need to be provided about this activity.</p> <p>The District needs to include an action item linking to and coordinating with implementation of the District plan it developed in OBEWL's three-year leadership institute entitled "Cultivating District Leadership to Build Systems for Multilingual Learner (MLL)/English Language Learner (ELL) Success."³</p>	

³ The New York State Education Department uses the term "Multilingual Learner" interchangeably with "English Language Learner."

Section	NYSED Comments & Questions for RCSD	Rochester City School District Response²
	<p>Also, the District's action items need to articulate how the identification and provision of instructional supports to Students with Interrupted/Inconsistent Formal Education will be incorporated into curriculum and professional development.</p> <p>Additionally, the action items need to reference and incorporate the following:</p> <ol style="list-style-type: none"> 1. The Next Generation Learning Standards 2. The NYS Bilingual Progressions 	
English Language Learners, Section 5	<p>While the action items are on target, the District must add details to articulate how it will match staffing to needs and keep track of changing needs in real time throughout the school year.</p>	
English Language Learners, Section 6	<p>In regard to developing a coherent corrective action plan to comply with NYSED's recommendations and its investigation report, more details need to be added and the District must revise and resubmit its draft Corrective Action Plan (CAP).</p> <p>OBEWL provided detailed feedback in writing and via conference call to the District on the revised CAP draft submitted November 30, 2018. The District conducted an extensive rewrite and resubmitted a second draft on February 22, 2019. Subsequently, OBEWL provided more feedback, and the District submitted a revision on April 5, 2019 that is under review. After finalization and approval of the CAP, the District will commence Quarterly Reports.</p>	
English Language Learners, Section 7	<p>Regarding the review of data and sharing of best practices on how to best serve ELLs and establish a network of schools focused on ELL needs, more details need to be provided.</p> <p>The District should add an additional action item to ensure accountability for effective implementation of the Plan's steps.</p>	
Organizational Structures, Section 1	<p>In regard to evaluating the effectiveness of each central office department, the District should ensure that the periodic surveys not only go to the employees of the various departments listed but also to the school personnel and staff they serve.</p>	

Section	NYSED Comments & Questions for RCSD	Rochester City School District Response ¹²
Organizational Structures, Section 2	When addressing the recommendation to reevaluate the organizational structure to encourage efficiency, collaboration, and accountability, the District made no commitment to action items other than those involving the improvement of communication. The District should specify which recommendations for organizational structure could be implemented now before a permanent Superintendent is hired.	
Organizational Structures, Section 3	In regard to improving meeting structures, the District should add a District Data Coordinator or District Data Administrator to central office staff and add action items to ensure that the position is created and/or maintained.	
Organizational Structures, Section 4	In response to the recommendation to provide PD in project management, the District specifies action items that the Performance Management Team will execute. However, by July 2019, a schedule should be in place for the PD and expertise for facilitation should be identified.	
Accountability, Section 2	The District has identified a Professional Development (PD) plan concerning the use of data. The District should ensure that the protocols address the DE's finding that data is not used to evaluate the effectiveness of strategies it has implemented.	
Accountability, Section 3	<p>In regard to the recommendation to establish a process to communicate, implement, document, and monitor continuous improvement in conditions that support learning, the District response provides an overview of how different offices will work with schools moving forward. However, the response does not indicate if there will be a clear process that will allow different offices to work together and strategically synchronize their support.</p> <p>While the action plan states that the Office of the School Chiefs (OSC), District offices and departments will improve practices that support schools in a coherent and consistent manner, the action items are too generic and require more specificity. The District should clarify who would be involved in the 1:1 meetings. The District should strengthen the proposed action by:</p> <ol style="list-style-type: none"> 1. Identifying a clear plan for how various offices will work with schools at specific points in the year (e.g., October or 1 week prior to the DTSDE review) in order to monitor practices and provide support. 	

Section	NYSED Comments & Questions for RCSD	Rochester City School District Response ²
	<ol style="list-style-type: none"> 2. Ensuring that the plan for OSC includes frequent visits to schools to see practices in action. 3. Identifying how different offices will coordinate their work to avoid duplication of efforts and ensure consistent messaging. 	
Accountability, Section 4	<p>In regard to providing principals with professional development on the school improvement planning process, the timeline proposed would not sufficiently address shortcomings in the planning process as the professional development is to be provided immediately after 2019-20 plans are due. Since the PD would occur in August 2019, and then in August 2020, it is unclear how PD would support the 2020-21 plans. In addition, the support focuses primarily on the end product of the planning process (i.e., the School Comprehensive Education Plan, or “SCEP”) without much attention given toward the processes that goes into developing an SCEP, such as understanding root causes, sequencing activities, and incorporating stakeholders into the SCEP process.</p> <p>The District should strengthen the proposed action by:</p> <ol style="list-style-type: none"> 1. Providing more details about the one-to-one professional learning opportunities being offered, such as how often and to whom. 2. Identifying specific times during the 2019-20 school year when guidance and PD supporting the SCEP process will be offered. This support should align with where schools would be in the planning process at that point in the year. For example, PD and guidance given in Winter could be on monitoring mid-year benchmarks, while PD given in the spring could be on working with stakeholders to understand needs of the school or selecting evidence-based interventions. 	
Accountability, Section 5	<p>The Plan does not provide a description of what School Chiefs will do in terms of supporting, reviewing, approving, and monitoring school plans.</p> <p>The plan indicates that the District by June 2020 will have offered annual professional learning on the school improvement planning process to School-Based Planning Teams. However, RCSD should be working on its plans now, as these plans are required to be completed annually.</p>	

Section	NYSED Comments & Questions for RCSD	Rochester City School District Response ²
	<p>The District states that it will monitor adherence to expectations and deadlines. However, the District should clarify exactly who will be conducting the monitoring in addition to the Deputy of Administration and Strategic Partnerships.</p> <p>The District should specify how District staff will be able to perform the work necessary to build an accountability system and protocols, considering the number of meetings proposed.</p> <p>The District should strengthen the proposed action by:</p> <ol style="list-style-type: none"> 1. Identifying what exactly the school chiefs will do differently moving forward. 2. Identifying how the District will ensure that schools are re-evaluating and revising their actions and goals each year. 3. Allowing sufficient time in the Spring for school-based teams to consider all that they know about the current state of the school and develop a plan to address the current needs. The obligation to submit plans to the Board of Education in May limits the amount of time school teams can reflect on their needs and identify solutions and, therefore, may impact the quality of the plans submitted. The District should reconsider this schedule to allow sufficient time for a quality school-based plan to be developed. 	
Human Capital, Section 1	<p>In regard to the development of a comprehensive PD program to help central office staff, teachers, paraprofessionals, and support staff to better meet the needs of students, the District's reference to "effective teaching practices for educating all students" is not specific. If there are NYS Teaching Standards, components of the Danielson Rubric, or other reference points for this work, the description should specify them in its response. Additionally, the District should create a protocol or process to measure the effectiveness of the PD that is offered and refine its PD offerings based on those inputs.</p> <p>The District should clarify whether it will identify school-specific needs and provide tailored PD opportunities and whether this work will be linked to the work of the data coordinator.</p>	

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	<p>Under the elements that must be included in the PD plan, the District should include more information on:</p> <ol style="list-style-type: none"> 1. Behavioral supports. 2. Implicit bias training that leads to concrete strategies and actions that improve teaching and result in better student outcomes. 3. Supports for special populations. 	
<p>Human Capital, Section 2</p>	<p>In regard to developing a coherent, year-long PD program to help prepare principals and assistant principals to lead for instruction, the response is not comprehensive or sufficiently organized.</p> <p>While there are activities with discrete timelines that allow the Department to determine whether the plan is being implemented, the District should use more specificity where the term “ongoing” is utilized.</p> <p>The District may strengthen its Plan by addressing the following questions:</p> <ul style="list-style-type: none"> • How is the District using the information from the needs assessment to ensure that the PD is part of a systems approach to support its administrators? • How will the District assess needs at the level of individual educators? • What criteria will the District use to select mentors? • What training will the District provide to mentors? • The District states that mentors are expected to observe and conference with interns. How often does this occur? What is the protocol for this? What are they observing and is it aligned with the Leadership Standards? • The District states it will evaluate professional learning monthly to refine and enhance content and design of delivery. What inputs are being collected? 	
<p>Human Capital, Section 3</p>	<p>In regard to developing a clear, rigorous, and competency-based selection process for principals that places final hiring authority with the Superintendent, the District should provide the referenced “School Administrator Selection Process” document.</p> <p>The District states that it will have candidates demonstrate competency/skills through an authentic task. The District should specify what the task is and how is it aligned to the</p>	

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	Leadership Standards as well as the District's priorities for attracting and placing the right leaders in the right buildings.	
Human Capital, Section 4	<p>In establishing a robust central office hiring process to produce the best candidates and select the most competent and qualified candidate based on pre-established criteria, the District states that it will use the Talent Management (TM) plan that is created as part of Human Capital Recommendation #6. This section references a comprehensive talent management plan that will address recruitment, hiring, and placement, but it does not provide any detail on how the plan will ensure the most competent and qualified candidates are selected based on pre-established criteria.</p> <p>The actions in this section of the Plan require more specificity regarding how the District will ensure compliance with nepotism policies, education and civil service law, and code of ethics requirements.</p> <p>The District may strengthen its Plan by considering the development and/or refinement of programs to recruit and attract high-quality candidates who have demonstrated success in key competencies (instructional leadership, teacher practice to support the need of diverse learners, etc.). Additionally, since retention is just as important as recruitment, the District may also wish to create and or/refine clear programs and policies, such as evidence-based mentoring and induction, career pathways, etc. that will ensure RCSD is able to retain and reward their best educators.</p>	
Human Capital, Section 5	The DE recommended that the District ensure that the optional 36-hour PD incentive for teachers directly supports student learning. It is noted that the District has committed to discussing the 36-hour PD program during the next contract negotiation (June 2019) with the Rochester Teachers Association. The District should ensure the cohesive alignment of the optional 36-hour PD incentive and the PD Plan, as described in Human Capital Recommendation #1.	
Human Capital, Section 6	In regard to creating a TM plan to properly support and develop all staff, the Plan does not address the issue of succession planning. While there are deliverables and timelines that	

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	<p>can be used to assess the District's progress, the deliverables are not specific enough to determine whether the intended outcome was achieved.</p> <p>The District's Plan addresses the creation of a TM planning team that includes teachers, assistant principals, and principals along with others. However, it does not specify the criteria to be used to determine who will be on this team or what attributes will be sought. The Plan also addressed the use of the American Institutes for Research (AIR) toolkit to determine how its TM plan supports equitable access to effective leaders. The District may consider using the AIR toolkit to assess equitable access to high-quality teachers as well.</p>	
Human Capital, Section 7	<p>When addressing the creation of a leadership academy, the District proposed conducting a needs assessment, researching existing promising leadership programs, and launching its leadership academy by June 2020. However, the only individual identified to support this work is the Superintendent, who will collaborate with the Deputy Superintendents. The District may also wish to consider specifying additional internal or external partners who can support the implementation of a leadership academy this timeframe. The District should focus on ensuring the involvement of all necessary stakeholders at the outset of the process to achieve buy-in and success by the June 2020 date.</p>	
Human Capital, Section 8	<p>Please see Human Capital, Section 5.</p>	
Finances, Section 1	<p>In regard to having the Board address District's finances as an entire body rather than by committee, beyond a change in frequency of meetings, the action item does not provide enough details to demonstrate that the Board's approach to the budget development process will be substantively different than in prior years. To strengthen its Plan, the District should explain the following:</p> <ul style="list-style-type: none"> • How will the new meeting structure contribute to more effective planning? • What ongoing changes will be made to improve the Board process? 	
Finances, Section 2	<p>In regard to ensuring that the Board participates in training aimed at providing better fiscal oversight, the Plan does not reference New York State School Board Association (NYSSBA) and instead repeats a reference to Association of School Business Officials</p>	

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	<p>(ASBO). RCSD should provide additional information to clarify the longevity and frequency of such trainings. As described in the DE report, the finance issue does not pertain to a lack of accounting skills, but the absence of a commitment to an ongoing practice of considering the overall financial needs – current and future – of the District and planning accordingly. Therefore, the District should include a more effective and sustained board coaching model instead of a three-hour session with OSC. The District should clarify what the model is for a shared commitment by the Board to engage in the trainings and use the knowledge and skills gained during the ongoing financial planning process.</p>	
<p>Finances, Section 3</p>	<p>In regard to establishing clear, consistent criteria for selecting consultants, the Plan acknowledges that new procedures must be developed. However, the plan then states that the new process will require all consultants be approved by a content-area expert. Consequently:</p> <ul style="list-style-type: none"> • The District must provide additional information to ensure that the selection process will not be highly decentralized. • The District should provide a clear description of the process to be followed in establishing the criteria for the selection of the vendors and consultants. • The District should develop transparent procurement processes that ensure highly qualified vendors and consultants are selected regardless of political considerations, personal connections, or outside influences. The process should enable stakeholders to identify the consultants, the goals toward which they are working, and the rationale for the selection. <p>In order to strengthen its Plan, the District should address the following:</p> <ul style="list-style-type: none"> • How will the District ensure that consultants are used only when necessary and that their work is appropriately monitored by the District for efficiency and effectiveness? • What controls are in place to ensure procurement is not affected by political considerations, personal connections, or outside influences? • Are the consultants doing work that should be done by District employees in a right sized, right skilled staffing model? • How are the proposed solutions adequately addressing the concerns? 	
<p>Finances, Section 4</p>	<p>In regard to having the Business Department collaborate more closely with other departments and task all District leaders with responsibility for efforts to reduce the</p>	

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	<p>structural deficit, the District Plan initially seems focused on budget reductions and then on improved monitoring of district finances. These actions would not contribute to improved collaboration among departments in the budget prioritization process. The District should include a central process to regulate spending by program leads in various cost-centers. To strengthen its Plan, the District should address the following:</p> <ul style="list-style-type: none"> • How will the District improve collaboration? • Why is the process so decentralized? • How is the District addressing the decentralization of the process? • How will the District ensure that it will control its cost centers to prevent a long-term structural deficit? 	
Finances, Section 5	<p>In regard to having the Chief Financial Officer (CFO) work with the Chief Communications Officer to prepare a clear, coherent presentation to show stakeholders what needs to be done to ensure the District's long-term financial health, the District may strengthen its Plan by addressing the following:</p> <ul style="list-style-type: none"> • How will the Board be engaged in the process? • How will the District ensure that the presentation will be neutral and insulated from the political side of the discussions? 	
Finances, Section 6	<p>In regard to considering the implications of the structural deficit during contract negotiations, the District should engage a consultant to facilitate negotiations. The District must clarify whether the engagement of the consultant serves to ensure that the District is able to negotiate for a fair and sustainable contract. Additionally, to strengthen its Plan, the District should address the following:</p> <ul style="list-style-type: none"> • Does the gap elimination plan make clear the future harm to students and staff if unsustainable funding models are assumed? 	
Finances, Section 7	<p>In ensuring all recommendations from the Office of the State Comptroller's (OSC) April 2017 report are implemented, the District Plan addressed the recommendation but does not clearly describe how the action items will be communicated to other stakeholders. The District Plan should include an action item to establish a report out process. The District should have made substantial progress in implementing this recommendation, since nearly two years have passed since the April 2017 OSC report. Therefore, the District should</p>	

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	<p>explain why the recommendations in the OSC report are not fully implemented and include implementation steps in its Plan. To strengthen its Plan, the District should address the following:</p> <ul style="list-style-type: none"> • What is the status of the action items? • Which action items have been the most difficult to implement and why? 	
Finances, Section 8	<p>In regard to having the District conduct a careful review of utilization and allocation of resources to determine whether these are aligned to the goals of sustainability and increased student achievement, the District's Plan needs to include centralized spending controls and expand its response to ensure consistency and sustainability. Additionally, the District should embed its planning into its systems to ensure longevity in fixing the spending controls. The District's statement that it will examine spending bimonthly is too passive an approach. It is essential that the District integrate resource use across District operations in a manner that focuses District resources on improvement of student outcomes. In all districts, but especially in a district with the fiscal challenges that RCSD faces, resources must be centrally and carefully managed to focus on desired student outcomes. To strengthen its Plan, the District should address the following:</p> <ul style="list-style-type: none"> • In the places where reporting has identified an over-allocation of resources, what has been learned about the causes of that problem? • How can such over-allocation be prevented in the future? Must this be addressed in collective bargaining or are there other approaches? • What is the plan to re-allocate resources more appropriately? • How will this affect staffing levels and service provision over the next 5 years? The next 10 years? 	
Finances, Section 9	<ul style="list-style-type: none"> • If the District is not going to accept the DE recommendations, the District should explain its reasoning. 	
Finances, Section 10	<ul style="list-style-type: none"> • If the District is not going to accept the DE recommendations, the District should explain its reasoning. 	
Finances, Section 11	<p>In developing a long-term financial plan aligned to District Instructional priorities and fiscal reality, the Plan is a good starting point. However, the plan focuses on an improved monitoring process, not fiscal controls. the District should describe a</p>	

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	<p>rigorous and transparent process for updating priorities over time and any mechanism for incorporating the results of the resource allocation study into the Plan.</p>	
Finances, Section 12	<p>In regard to developing an addendum to the budget book that gives the community a concise, clear understanding of the budget, the Plan adequately addresses the recommendation proposed by the DE.</p> <p>It is further recommended that the information be linked to previous recommendations that the Board Commissioners and the CFO work together to create a presentation on District fiscal health to help the community understand how this year's budget fits into the context of improving the long-term financial and educational stability of the District.</p>	
Finances, Section 13	<p>In regard to requiring Board resolutions with potential significant fiscal implications be accompanied by a cost analysis, the Plan attempts to implement the recommendation, but should specify a requirement for analyses to be prepared enough in advance to allow for meaningful discussion by the Board when it is considering adoption of an action with significant fiscal implications.</p> <p>The District should include assurances that the cost analyses will be discussed by the Board prior to the adoption of a resolution and that the template addresses both long-term impacts and explains what changes might need to be made to accommodate and support the new priority.</p> <p>To strengthen its Plan, the District should explain and justify the division of labor among the department managers and the CFO in preparing cost analyses.</p>	
Parent & Community Engagement, Section 1	<p>In regard to developing success metrics for the role of the parent liaison, the Plan references percentages of time that parent liaisons and home school assistants should spend engaging directly with parents. This approach to accountability focuses on quantity rather than quality. The plan does not identify intended outcomes associated with the suggested distribution of time nor does it include metrics for holding staff accountable for</p>	

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	<p>those outcomes. Additionally, the plan does not identify a date for implementation of the accountability metrics.</p> <p>The District may strengthen its Plan by addressing the following:</p> <ul style="list-style-type: none"> • What will successful deployment of parent liaisons look like across the District and/or at specific schools? • How did the District determine the noted percentages would be effective use of a parent liaison? • How might performance targets and accountability be incorporated into relevant job descriptions? 	
<p>Parent & Community Engagement, Section 2</p>	<p>In regard to setting consistent expectations for parent liaisons and defining their job responsibilities, the DE's recommendations have been addressed in the response, but additional revisions are still recommended.</p> <p>The District should define how it will measure the outcomes of "increased parental involvement" and define benchmarks and goals for student attendance.</p> <p>The District should begin holding principals accountable for parent and community engagement at the start of the 2019-20 school year (not November 2019). Accountability metrics for principals should be aligned with the implementation of accountability metrics for parent liaisons and home school assistants outlined in Section 1.</p> <p>To strengthen its Plan, the District should address the following:</p> <ul style="list-style-type: none"> • Who is the direct supervisor for the parent liaisons and who monitors their use of time? • How will a log recording parent liaison interactions provide insight into the quality of these interactions? • How will the District assess whether parents believe there has been an improvement in engagement? 	

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Parent & Community Engagement, Section 3	<p>The action item regarding engaging the roundtable and officers of the advisory councils to provide feedback for the Office of Parent Engagement requires more specificity around the intended outcomes, timeline, and facilitation.</p> <p>To strengthen its Plan, the District should address the following:</p> <ul style="list-style-type: none"> • How will the District engage a wide group of relevant stakeholders in its review of its Parent Engagement Policy? • How will Parent Advisory Council (PAC) and roundtable meeting materials be made available to the public in advance of and/or following each meeting to promote transparency? • How will the planned actions increase transparency or parent participation? • Will the actions result in a consistent process and forum for parent leaders to share their insights? 	
Parent & Community Engagement, Section 4	<p>In regard to creating a subcommittee of the Bilingual Council to focus on the needs of non-Spanish speaking English language learners (ELL), the proposed action may be strengthened by addressing the following:</p> <ul style="list-style-type: none"> • How will parents and other relevant stakeholders provide input regarding the viability and structure of the subcommittee? • If the discussions result in a determination that a subcommittee is not viable, how will the needs of non-Spanish speaking ELLs be addressed? • What metrics can the District put in place to track, identify, and respond to the needs of non-Spanish speaking ELLs? 	
Parent & Community Engagement, Section 5	<p>Regarding the development of a comprehensive parent engagement plan, the proposed action should be strengthened by describing how the parent engagement plan will be monitored for success and revised as necessary over time.</p> <p>The District should also address the finding that some parents have felt unwelcome in schools and their belief that this stems from racial bias within the system.</p> <p>The District may strengthen its Plan by addressing the following:</p>	

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	<ul style="list-style-type: none"> • How will parents provide input regarding revisions to the parent engagement plan? • How will the parent engagement plan be disseminated to parents (in a language they can understand) once it is developed? 	
Parent & Community Engagement, Section 6	The proposed actions should be strengthened by clarifying when the Superintendent will begin attending the Chamber of Commerce and subcommittee meetings. The District may further strengthen its Plan by explaining how appropriate subcommittee meetings will be identified and/or prioritized.	
Parent & Community Engagement, Section 7	<p>Regarding the District seeking opportunities for students within the business community, the DE's recommendations were generally addressed in the response.</p> <p>Establishing criteria for work-based learning (WBL) hours transferable to student transcripts should be a more immediate priority in advance of expanding partnerships and opportunities. This will allow for clear expectations to be shared with new partners and ensure that existing and new WBL opportunities are of quality and meaningfully contribute to student learning.</p> <p>The District may strengthen its Plan by addressing the following:</p> <ul style="list-style-type: none"> • How will parents be engaged in regard to offering WBL opportunities for high school students? • What metrics can be used to track success in addition to the number of internships? • What are the District's long-term goals for the percentage of students participating in WBL opportunities and how will RCSD measure interim progress towards that goal? • What is the current number of student internships and how did the District identify its 20 percent target? 	
School Climate, Section 2	In ensuring that the resources, supports, structures, and practices that promote a restorative philosophy and positive school climate are in place in every school, the District should require that each school work with the Community Engagement Team to develop a plan for implementation of restorative practices and school climate improvement actions. The District should strengthen this action by describing how it will use its school climate	

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	survey data and other data such as chronic absenteeism and suspension information to set targets for and monitor progress toward improvement in school climate.	
School Climate, Section 3	In regard to developing a plan to implement the recommendations from the Advisory Special Committee on School Climate, the District should provide training to students in restorative practices so that students could lead, for example, community building circles.	
Operations, Section 1	<p>The district should analyze the recommendations from the Pupil Transportation Safety Institute's (PTSI) report and decide which merit implementation.</p> <p>It appears that the district has made efforts to implement some, but not all, of the recommendations from PTSI. While it may be appropriate to address select recommendations, the District did not provide an explanation of why those recommendations were selected and/or prioritized.</p> <p>The three PTSI recommendations that were addressed in the response were the recommendations related to the bus lift, routing software, and contract renegotiation. In its response, the District has included vague timelines for the implementation of these three recommendations.</p> <p>For example—</p> <ul style="list-style-type: none"> a) The approval of a portable post lift by NYSED is listed as TBD. Yet, NYSED generally responds to requests for approval of equipment within 7-10 days of receipt. b) Routing software: The District proposes the following timeline: RFP for new routing software (Apr. 2019); Training for the new software (Apr./May 2020); Implementation of new routing software (Jul. 2020). <p>It is unclear why this process is projected to take so long. The delay in implementation will cause the District to miss a year of cost savings. The District response should indicate what steps are being taken to meet the needs of school start up for the 2019-20 school year.</p>	

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	<p>Since the busing contract with the RTA expires in 2020, beginning the negotiations as soon as possible might provide a substantial savings to the District.</p> <p>The district should explain why RCSD failed to respond to any of the PTSI recommendations pertaining to school zones and childcare that may reduce ride time and provide higher attendance rates.</p>	
<p>Operations, Section 2</p>	<p>The DE recommended that the District conduct an in-depth assessment to develop strategies to solve the beginning of the school year student transportation problems. It appears that the District's operation staff has been working to implement this recommendation.</p> <p>However, there are key issues not addressed in the response:</p> <ul style="list-style-type: none"> • While the District identified the contract carrier as the contributor to the crises, the ultimate responsibility for transportation falls on the District and the board of education. The District should have a transportation director whose responsibilities include the oversight of District owned and contracted transportation; school bus routing; and management of professionally trained drivers, monitors and attendants who are in compliance with Department of Motor Vehicles, NYSED and Department Of Transportation requirements. Because the District's aid ratio reflects local capacity, the state will support 90% of the costs for a director. This function supports both fiscal efficiency and student safety. • The District describes a plan to provide greater oversight of carriers through monthly inspections and the creation of working groups. Have ongoing processes and documentation been put in place to track day-to-day issues, insufficiencies and necessary improvements? • The response stated the carrier's senior leadership had been terminated. Have steps been taken to ensure that the new senior leadership is in place and involved in the new strategies? Has the District informed the carrier of the requirements needed to comply with DMV, SED and DOT? • The response does not describe the plan for communication and transmission of data between the District and the carrier. 	

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	<ul style="list-style-type: none"> • The response does not indicate that the District has processes to ensure that the carrier has the correct student information for student pick up and drop off • To protect student safety, RCSD needs to monitor carriers by reviewing driver DMV and SED files, ensuring the mandated bus safety drills and refresher trainings occur and are documented. 	
Operations, Section 3	<ul style="list-style-type: none"> • The DE recommended putting effective systems in place to prevent crises from occurring. • Some of the crises known to NYSED include general busing issues, the Trayvon Rowe situation, poorly coordinated work with Jackson County School Board, construction, emergencies related to out of building criminal activity, etc. These each require different approaches. • Some of the above are addressed in the District's response, some are not. The overall impression is that operational systems in the District require further integration. Addressing this is difficult when there are emergent situations that must be handled daily, but a long-term plan is essential. Resources and operations must be focused on improving student outcomes. • District's planning of school construction projects and linkages to overall instructional and financial plans should be reviewed. • Response should also indicate what the district will do after it has reviewed/analyzed the various plans it mentioned in the report. For example, once the safety and emergency busing plans are created and communicated, will the District periodically perform stimulations and practice the mechanics of the plan with staff to evaluate effectiveness and efficiency? • With regard to busing, what is the prescribed method of communication and transmission of data between the District and the carrier? • Will the District create activation guidelines, detailed action plans for each department, pre-approved crisis communication strategy and messaging, and a thorough contact list with detailed phone trees and a detailed resource repository? • The district mentioned "Review and confirm all special education placements by Office of Specialized Services." The PTSI report recommended reviewing the overly 	

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	<p>restrictive conditions in IEPs as part of Phase III. The district should consider this recommendation in the context of its overall reforms to the special education system.</p> <ul style="list-style-type: none"> The District should create internal controls to support the safety of students and staff during and after an event. 	
Operations, Section 4	<ul style="list-style-type: none"> The DE recommends that the District ensure that Standard Operating Procedures (SOPs) are clearly understood and followed. While it appears that the District's operational staff is in the process of implementing this recommendation, the changes do not appear to be sufficient. Each school and office/department is required to submit updated operating procedures. Why are schools creating their own procedures? It is recommended that there is a single set of SOPs for each school level, developed by a workgroup of building level and central office staff. The District should provide clear guidelines and templates for each school office and department. The District should ensure that operating procedures will be collected, inventoried, and put in a repository as well as posted and communicated with the staff. The Superintendent must ensure that all operating procedures are consistent in all the schools and department within the District. What is the connection of Phase 1 and 2 to the educational stability of the child? How will RCSD keep student safety, security and academic success as a central priority through these procedures? The District should make unannounced inspections to see if the procedures are being followed. 	