

ND FIRST Public Comment Period Feedback and Responses *(October – November 2024)*

Total responses: 16

Do you have any feedback on the ND School Improvement Process Map?

Feedback	ND FIRST Response and Actions
<p>Concern with Standardization: The Process Map applies standardized criteria across districts, which may not align with the unique goals and resources of individual school boards and communities. In Fargo Public Schools, we prioritize cascading goals from our local school board down to individual schools, emphasizing alignment with our specific community’s vision. The new metrics in this plan may not reflect the strategic priorities we have worked towards over time, making it difficult to demonstrate progress in ways that match our goals.</p> <p>Lack of Initial Opportunity: Schools currently identified for CSI status did not originally work toward these newly defined metrics, which could result in misrepresentations of school improvement or failure. As a result, schools may not have had the chance to improve on these new indicators, yet they will be judged by them. The shift in metrics mid-process risks undermining the progress schools have made using their own tailored strategies, creating a mismatch between local objectives and state-level expectations.</p>	<p>It is important to recognize that schools or districts who qualify for ND FIRST will not necessarily be required to establish new North Dakota accountability metrics, but they will be required to set more concrete progress monitoring goals and expectations based on the current accountability measures. Qualifying for ND FIRST indicates that a school or district is not making substantial progress toward student outcomes. Schools may maintain, extend, and improve the school improvement plans they developed as a CSI school and continue working towards their goals while receiving an extra layer of support provided through ND FIRST.</p> <p>ND FIRST allows for more check-ins and progress monitoring than in Targeted Support and Improvement (TSI) and Comprehensive Support and Improvement (CSI) models. ND FIRST schools/districts will have the opportunity to define certain metrics to measure their goals, as defined in the customized expectations developed through their Collaborative Partnership Agreement (MOU). Therefore, those metrics could be “driver metrics” that the school has already identified in its school improvement plans. This may include NDDPI gaining increased oversight over certain functions of the school or district when necessary, but it does not mean NDDPI will require schools to rewrite their improvement plans from scratch.</p> <p>NDDPI will adjust the Process Map to more clearly communicate that ND FIRST schools will not necessarily have to disrupt their current school improvement plans by introducing new metrics if evidence is showing improvement on said metrics.</p>

<p>Determine if the underperformance may be due to the same students underperforming in each of those years, bringing the scores down.</p>	<p>All Targeted Support and Improvement (TSI) and Comprehensive Support and Improvement (CSI) schools undergo a local root cause analysis to determine what is impeding their improvement. This root cause analysis should be routine for <i>all</i> schools on a regular basis, not just those with TSI or CSI identification. Schools/districts eligible for ND FIRST would have findings from their root cause analyses to help identify where they need to target their support and how NDDPI and ND FIRST teams can support them.</p> <p>NDDPI adjusted the language in the Collaborative Partnership Agreement (MOU) to clearly state that <i>“The ND FIRST school or district, with support from NDDPI and the ND FIRST teams, will revisit their root cause analysis to discern the primary factor(s) inhibiting school improvement, identify challenges or opportunities for growth, and identify assets that can be leveraged to address those opportunities.”</i> Thus, schools and districts are encouraged to identify approaches that best meet their local needs and context while aligning to state and federal academic outcome expectations.</p>
<p>Well, we know what they’re going to do but they don’t explain how in any of that.</p>	<p>Every school or district’s experience in ND FIRST will look different. This is precisely why the Collaborate Partnership Agreement (MOU) was designed to be customizable and co-developed between NDDPI and the ND FIRST school/district. The Collaborative Partnership Agreement is meant to facilitate the conversation on <i>how</i> the ND FIRST school/district will improve, as well as how NDDPI will support their improvement. Additionally, the Project Team Charter will highlight how the external ND FIRST team members will further support ND FIRST schools’/districts’ progress toward their agreed-upon expectations.</p>
<p>What happened to the idea to remove administration that is not making the decisions on educating the students using new forms of education?</p>	<p>As articulated in Senate Bill 2254, the stimulus for ND FIRST, removing members of a school or district administration is one action that those in ND FIRST may take. The decision to do so would be discussed between NDDPI and the ND FIRST school or district when co-developing the Collaborative Partnership Agreement. As a reminder, every ND FIRST school or district will take different actions to meet</p>

	<p>their school improvement goals. Those decisions are highly dependent on the school's local context and needs and the results of the findings report and other evaluations.</p>
<p>If a school is now in the next phase, this would mean that the state has had the opportunity to support the school and has not. What research and what experts have been called upon to develop a plan that is different than what is in place?</p>	<p>The support NDDPI provides to ND FIRST schools and districts differs from their role in TSI/CSI schools. In the current TSI/CSI model, NDDPI is able to provide support in implementing the school or district's existing school improvement plan and evaluate what is or is not working. They do not, however, take over certain functions or require the school or district to change their locally created school improvement plan. In ND FIRST, NDDPI is entitled to increased oversight of certain school functions, as articulated in the "Consistent Expectations" section of the Process Map.</p>
<p>Overall, I appreciate that all documents emphasize partnership to support student growth, through research and best practices. The goal cycles are reasonable (six weeks). One fear is that if a CSI school is in year four, some of the practices that are research-based need a discussion before they would need to be discarded, systemic change does not happen in one or two years, it can take up to five. My hope is as a team with DPI or external coaches this can be vetted out.</p>	<p>If a school or district has been implementing changes that are working and proving effective, the hope is that the Progress Review embedded in ND FIRST will identify successes, challenges, and next steps. In other words, ND FIRST is not meant to force schools/districts to start over. The goal is for the state to work strategically with the school or district to construct a plan that helps them build on what <i>has</i> been working and not on what has not.</p>
<p>Yes. I am a teacher in a current CSI school. My son also attends this school. Frankly, the current school improvement processes are not addressing the root causes of low academic achievement. The two main causes of low academic achievement are 1. No/low pre-k involvement for incoming students 2. Behavioral issues are inhibiting classroom learning.</p> <p>If you do not support the removal of violent students in the classroom, these schools will not see positive academic achievement in the long term.</p>	<p>The root cause analysis phase is intended to identify what has been working and not working in individual CSI schools. NDDPI strongly believes each individual school has unique needs, which is why ND FIRST has been designed to be adaptive and customizable.</p> <p>NDDPI will continue to provide resources, professional development opportunities, and other support geared toward the topics you have mentioned. NDDPI believes that all students have the ability to learn and achieve their highest potential, which is why there is a multi-tiered level of support embedded within the ND FIRST framework. NDDPI strives to make student outcomes a priority in all aspects of this work.</p>
<p>Yes. Many problems are not accountability related. You are driving great teachers away. The real problem is putting 25-30 elementary kids in a room and expecting a miracle. (any room over 20 is</p>	<p>First, please understand that ND FIRST is not an initiative nor is it intended to be a remedy for all issues a school may be facing. It is an accountability model required by both the state and federal</p>

<p>educational malpractice in the name of keeping the taxes low.) A real problem is allowing horrifying behaviors to be protected because of an IEP, and not wanting to actually pay for the services needed. Another problem is the soul crushing poverty a lot of families deal with. Now ram accountability, new mandates, more meetings, grind harder down to the teachers. Good teachers leave because they are sick of taking the blame. Then you are left with either brand new teachers or long-term subs. Teacher turnover and retention. Stop with the initiatives. Please.</p>	<p>government, as described in Senate Bill 2254. The strategic framework and guidance documents provided demonstrate how NDDPI is implementing both state and federal accountability measures to support low-performing schools in achieving their improvement goals.</p>
<p>A better way to evaluate student knowledge and progress. Our ND state assessments are terrible and do not accurately assess student knowledge.</p>	<p>The ND FIRST accountability model is aligned with the assessments and accountability related to state and federal requirements, as stipulated in Senate Bill 2254.</p>
<ol style="list-style-type: none"> 1. Never mentions remedy for student-on-student violence. 2. Never mentions remedy for student-on-faculty violence. 3. Never mentions remedy for "grade inflation". 4. * 5. * 6. Never mentions remedy for truancy. 7. Does not hold "parent(s)" accountable for minor children 8. Appears to be a gigantic waste of time, money, effort, and enthusiasm creating red tape but failing to identify let alone solve problems. 	<p>ND FIRST is not intended to be a remedy for all issues a school may be facing. It is an accountability model required by both the state and federal government, as described in Senate Bill 2254. The strategic framework and guidance documents provided demonstrate how NDDPI is implementing both state and federal accountability measures to support low-performing schools in achieving their improvement goals.</p>
<p>On the surface this has the appearance of "the beatings will continue until morale improves". There is no mention of root cause, best practices, or task force support. A needs assessment may be misdirected if the root cause of the poor performance is not understood. If the underperforming school is overwhelmed with the basic day-to-day operation and/or they do not have the skill level available to be able to adapt or adopt, then simply throwing a coach and some money at them will not be effective. Also, performing progress monitoring through "student outcomes" is a lagging metric and should be used as a "results metric". What is needed is a "driver metric" that will give more effective feedback to the district. Recommend a metric tied to interventions and moving students</p>	<p>All TSI and CSI schools undergo a local root cause analysis to determine what is impeding their improvement. This root cause analysis should be routine for <i>all</i> schools on a regular basis, not just those with TSI or CSI identification. Schools/districts eligible for ND FIRST would have findings from their root cause analyses to help identify where they need to target their support and how NDDPI and ND FIRST teams can support them.</p> <p>NDDPI adjusted the language in the Collaborative Partnership Agreement (MOU) to clearly state that <i>"The ND FIRST school or district, with support from NDDPI and the ND FIRST teams, will revisit their root cause analysis to discern the primary factor(s) inhibiting</i></p>

<p>through the core plus more and replacement core interventions. [DISTRICT*] has examples of this in their strategic plan. Overall, the process map should represent more of a partnership between the district and DPI.</p>	<p><i>school improvement, identify challenges or opportunities for growth, and identify assets that can be leveraged to address those opportunities.”</i> Thus, schools and districts are encouraged to identify approaches that best meet their local needs and context while aligning to state and federal academic outcome expectations.</p> <p>ND FIRST schools/districts will have the opportunity to define certain metrics to measure their goals, as defined in the customized expectations developed through their Collaborative Partnership Agreement (MOU). Therefore, those metrics could be “driver metrics” that the school has already identified in their school improvement plans.</p> <p>ND FIRST is certainly a partnership between the school or district and NDDPI. The Project Team Charter document clearly shows that partnership, while the Collaborative Partnership Agreement (MOU) and the Process Map define the partnership further by delineating roles between NDDPI and the identified ND FIRST school or district. In the revised Process Map, NDDPI plans to incorporate elements that more clearly demonstrate this partnership.</p>
<p>A Public Preschool option for low performing elementary schools with multilanguage learners, low socioeconomic status, transient population, single parent homes, homeless population, high turnover of staff and very, very few students who have attended preschool or even daycare.</p> <p>Also, kindergarten needs to be mandatory in North Dakota.</p> <p>Early intervention is key to successful education. National average is two years of preschool. Brain research shows that most learning occurs from birth to five years old. A Public Preschool option for low performing schools would show equitable educational opportunities to foster growth for our most at-risk children.</p>	<p>NDDPI will continue to provide resources, professional development opportunities, and other support geared toward the topics you have mentioned. NDDPI believes that all students have the ability to learn and achieve their highest potential, which is why there is a multi-tiered level of support embedded within the ND First framework. NDDPI strives to make student outcomes a priority in all aspects of this work.</p> <p>These issues would need to be brought to the state legislature, not addressed through ND FIRST. If the issues you have stated are determined at the local level to be a root cause of slowed school improvement, some of these changes could be introduced in the Collaborative Partnership Agreement (MOU), school policy, and local funding.</p>

<p>The process map does not significantly allow for Native students' performance in ND schools. There are gaps that have been on-going for more than 3 years and nothing was done to try and help with improving their academic programs. Old quote "one size does not fit all". The trend for education is not inclusive for true diversity.</p>	<p>As stated in the Process Map, a core component of the Collaborative Partnership Agreement (MOU) is that it <i>"recognizes the local beliefs, values, and behaviors"</i> of the ND FIRST school or district. Each Collaborative Partnership Agreement (MOU) should acknowledge a school's context and use that information to address its needs. ND FIRST is certainly not one-size-fits-all but rather allows for flexibility to address the needs of each and every learner. As a reminder, ND FIRST is the state and federal accountability model required for any public school receiving public funds. At any point, a school can choose to become a non-public or BIE-only entity.</p>
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Do you have any feedback on the ND FIRST Collaborative Partnership Agreement (MOU)?

Feedback	ND FIRST Response and Actions
<p>Arbitrary Metrics of Success: This agreement introduces new success metrics that are not aligned with many districts' previously established goals. The fear is that districts like ours have worked diligently on local, board-driven priorities, and this agreement shifts focus to arbitrary metrics that may not reflect meaningful or holistic progress. The MOU should allow for local adaptation, ensuring that we are measuring success in ways that resonate with the community's vision and values rather than state-level generalizations.</p> <p>Ignoring Local Context and Developmental Theory: The MOU appears to bypass critical child development theories, such as Uriel Bronfenbrenner's ecological systems theory, which emphasizes the role of the local environment in shaping child outcomes. Tailoring support to our unique student population, including the socio-emotional supports that [DISTRICT*] emphasizes, is key to long-term success. Therefore, the MOU should incorporate flexibility for districts to utilize more contextually relevant, research-backed approaches in partnership agreements.</p>	<p>ND FIRST draws on new and existing research to improve education for all students. The ultimate goal of ND FIRST is to align the various systems engaged in the education of North Dakota students in order to provide comprehensive support for low-performing schools.</p> <p>ND FIRST is an accountability model required by both the state and federal government, as described in Senate Bill 2254. There is customization intentionally built into ND FIRST to reflect local school and district needs. However, ND FIRST does not overhaul or take over a school or district's local initiatives; it is always expected and encouraged that these local initiatives reflect local needs. All schools should be conducting routine root cause analyses in order to determine which research-backed initiatives make the most sense in the context of their school.</p>
<p>Well, we know what they're going to do but they don't explain how in any of that.</p>	<p>The "how" is best explained in the ND FIRST Project Team Charter and the internal operational models. ND FIRST is an accountability model</p>

	required by both the state and federal government, as described in Senate Bill 2254 . The strategic framework and guidance documents provided demonstrate how NDDPI is implementing both state and federal accountability measures to support low-performing schools in achieving their improvement goals.
Our school understands the needs and this process would slow down progress.	Qualifying for ND FIRST indicates that a school or district is not making substantial progress toward student outcomes. Schools will maintain the school improvement plans they developed as a CSI school and continue working towards their goals, while receiving an extra layer of support provided through ND FIRST.
The evaluation system for superintendents, principals and teachers is interesting. Can the research on this be shared on the website, having a school in year 3 of CSI, it would be good for our district to review and check our current systems. The length of the school year is interesting, but I am more concerned with the length of the school day and how changes like this work with the teaching contract. Is there any documentation that these types of changes can be done over the contract agreement with teachers.	Senate Bill 2254 , as well as the Collaborative Partnership Agreement (MOU), documents the changes that may occur through ND FIRST include, <i>“Changes to curriculum, training, instruction, assessment, or the school calendar in the school or school district.”</i> Specific changes of interest to the school, such as the length of the school day, would fall under this category and could be implemented in the school’s MOU if determined necessary to meet the identified needs.
Overall content is comprehensive and does contain the elements of root cause and SMART goals/requirements. There should be an allowance for a change of the implementation plan that is structured, ensures the goals will be met, and is mutually agreeable to both parties. The scenario being that the needs assessment and root cause analysis is not accurate, or the implementation plan is not effective and needs to be re-evaluated or adjusted, before the 36-month period is realized.	<p>Note that there are progress monitoring checks that happen prior to the 36-month period, as stated in the Collaborative Partnership Agreement (MOU).</p> <p>As reinforced in the MOU, while goals remain firm throughout the 36-month period, the implementation plan is flexible and subject to change to accommodate the school or district’s ongoing needs. NDDPI has revised Section V.B. of the MOU to state, <i>“While goals, 18-month interim target benchmarks, and 36-month end target outcomes do not change, an ND FIRST school and district will monitor and may need to adjust strategies, activities, funding, and communication to attain the final goal.”</i></p>
One element is not included in the partnership which is our Native American students. Mainstream education has not worked in over 20 years and now this is suppose to be the solution. Let's add more	As stated in the Process Map, a core component of the Collaborative Partnership Agreement (MOU) is that it <i>“recognizes the local beliefs, values, and behaviors”</i> of the ND FIRST school or district. Each Collaborative Partnership Agreement (MOU) should acknowledge a

<p>things to the teachers plate. What about including parents in all this process (true input) from one unit of stakeholders in school programs.</p>	<p>school's context and use that information to address its needs. ND FIRST is certainly not one-size-fits-all but rather allows for flexibility to address the needs of each and every learner. As a reminder, ND FIRST is the state and federal accountability model required for any public school receiving public funds. At any point, a school can choose to become a non-public or BIE-only entity.</p> <p>Parents are an important part of this process. The Process Map states that one of the key characteristics of the Collaborative Partnership Agreement development is that <i>"Communication and consultation with families is transparent and managed appropriately."</i></p>
<p>Teachers and ESPs have to have a major voice in writing the MOUs as they are the professionals who will enact any plan. Also, any MOU should allow for a wholistic view of the barriers to good learning, and not be looked at as a failure on the part of educators. So much of what affects student learning occurs outside the school day and has to be taken into account in any MOU.</p>	<p>Teacher and school leader voices will be valued as part of developing the Collaborative Partnership Agreement (MOU). More importantly, teachers need to be supported during ND FIRST implementation. Thus, one of the consistent expectations for ND FIRST schools and districts in their initial 18 months of ND FIRST is to <i>"[Engage] in authentic personnel management, supervision, and evaluation processes for teachers, principals, and superintendent to generate the most effective feedback to support instruction."</i></p> <p>ND FIRST is designed with the understanding that school improvement can be hindered by a wide variety of factors. As stipulated in the Collaborative Partnership Agreement (MOU), <i>"The ND FIRST school or district, with support from NDDPI and the ND FIRST teams, will revisit their root cause analysis to discern the primary factor(s) inhibiting school improvement, identify challenges or opportunities for growth, and identify assets that can be leveraged to address those opportunities."</i> Revisiting the root cause analysis phase is intended to ascertain what barriers exist in an ND FIRST school or district so that the school/district and NDDPI can work together to implement a plan to address them.</p>

Do you have any feedback on the ND FIRST Project Team Charter?

Feedback	ND FIRST Response and Actions
<p>Risk of Misaligned Focus: While the project team charter outlines a structured approach to intervention, it could lead to misaligned priorities for districts that have been working on local improvement plans. [District*], for example, has developed detailed strategic initiatives, focusing on equity, resource allocation, and student outcomes. A rigid, centralized approach may limit our ability to focus on these locally determined areas of improvement, thus impeding our ability to tailor interventions to our specific needs.</p> <p>Flexibility for Local Implementation: The Charter should explicitly allow districts to adapt intervention strategies to their local strategic priorities. [District*], for instance, uses results monitoring and budget alignment practices to ensure that resources are directly tied to specific student outcomes. A one-size-fits-all approach risks stifling these locally successful practices.</p>	<p>The ND FIRST teams defined in the Project Team Charter do not serve the purpose of entering a school and overhauling their operating school improvement plan. Rather, ND FIRST teams provide additional state-funded support to work more efficiently toward achieving the goals outlined in their school improvement plan. Furthermore, in developing the Collaborative Partnership Agreement (MOU) and interacting with the ND FIRST teams, ND FIRST schools and districts may identify new approaches they had not yet considered that are even more effective in their local context – that being said, they could also demonstrate progress and continue their improvement plans as usual without making significant changes. The purpose of the Collaborative Partnership Agreement (MOU) is to ensure this is an individualized plan that meets the specific needs of the school and local context.</p>
<p>Well we know what they're going to do but they don't explain how in any of that.</p>	<p>The “how” is best explained in the ND FIRST Project Team Charter and the internal operational models. ND FIRST is an accountability model required by both the state and federal government, as described in Senate Bill 2254. The strategic framework and guidance documents provided demonstrate how NDDPI is implementing both state and federal accountability measures to support low-performing schools in achieving their improvement goals.</p>
<p>The school in improvement already has a plan and this approach looks like it is starting over</p>	<p>The ND FIRST teams defined in the Project Team Charter do not serve the purpose of entering a school and overhauling their operating school improvement plan. Rather, ND FIRST teams provide additional state-funded support to work more efficiently toward achieving the goals outlined in their school improvement plan. Furthermore, in developing the Collaborative Partnership Agreement (MOU) and interacting with the ND FIRST teams, ND FIRST schools and districts may identify new approaches they had not yet considered that are even more effective in their local context – that being said, they could also demonstrate progress and continue their improvement plans as usual without making significant changes. The purpose of the</p>

	Collaborative Partnership Agreement (MOU) is to ensure this is an individualized plan that meets the specific needs of the school and local context.
There should be an element of Lessons Learned captured and an analysis performed on the case studies to look for common threads. Answering the question "how did those schools get to the point of chronic low-performance and how can that be detected and prevented from recurring?" Taking it beyond the tactical intervention to a strategic opportunity within DPI.	<p>First, please understand that ND FIRST is not an intervention. It is an accountability model required by both the state and federal government, as described in Senate Bill 2254. The strategic framework and guidance documents provided demonstrate how NDDPI is implementing both state and federal accountability measures to support low-performing schools in achieving their improvement goals.</p> <p>All TSI and CSI schools undergo a local root cause analysis to determine what is impeding their improvement. This root cause analysis should be routine for <i>all</i> schools on a regular basis, not just those with TSI or CSI identification. Schools/districts eligible for ND FIRST would have findings from their root cause analyses to help identify where they need to target their support and how NDDPI and ND FIRST teams can support them.</p> <p>NDDPI adjusted the language in the Collaborative Partnership Agreement (MOU) to clearly state that <i>"The ND FIRST school or district, with support from NDDPI and the ND FIRST teams, will revisit their root cause analysis to discern the primary factor(s) inhibiting school improvement, identify challenges or opportunities for growth, and identify assets that can be leveraged to address those opportunities."</i> Thus, schools and districts are encouraged to identify approaches that best meet their local needs and context while aligning to state and federal academic outcome expectations.</p>
Charter school vs What? Boarding schools did not help, and now the state is trying to indicate they have a solution to help students achievement in our ND school systems.	<p>The Project Team Charter does not refer to charter schools. Rather, it is a document that outlines the ND FIRST teams' purpose and goals as they relate to ND FIRST.</p> <p>ND FIRST is not intended to be a remedy for all issues a school may be facing. It is an accountability model required by both the state and</p>

	<p>federal government, as described in Senate Bill 2254. The strategic framework and guidance documents provided demonstrate how NDDPI is implementing both state and federal accountability measures to support low-performing schools in achieving their improvement goals.</p> <p>As stated in the Process Map, a core component of the Collaborative Partnership Agreement (MOU) is that it “<i>recognizes the local beliefs, values, and behaviors</i>” of the ND FIRST school or district. Each Collaborative Partnership Agreement (MOU) should acknowledge a school’s context and use that information to address its needs. ND FIRST is certainly not one-size-fits-all but rather allows for flexibility to address the needs of each and every learner. As a reminder, ND FIRST is the state and federal accountability model required for any public school receiving public funds. At any point, a school can choose to become a non-public or BIE-only entity.</p>
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Do you have any other feedback related to ND FIRST?

Feedback	ND FIRST Response and Actions
<p>ND needs to look at family systems and support outside of school for academics to ever improve. Our schools and our teachers are incredible. The barriers towards education do not come from school, they come from poverty, chronic hunger, neglect, exposure to domestic violence, and parents with substance abuse issues. Until we have more systemic solutions and give harsher penalties to parents for truancy, we will not see an improvement in academics.</p> <p>The bare bones educational neglect we currently have (which is a \$50 fine IF convicted) doesn't even start until age 7, long after school habits are made.</p>	<p>ND FIRST is not intended to be a remedy for all issues a school may be facing. It is an accountability model required by both the state and federal government, as described in Senate Bill 2254. The strategic framework and guidance documents provided demonstrate how NDDPI is implementing both state and federal accountability measures to support low-performing schools in achieving their improvement goals.</p> <p>Families, teachers, and school leaders are all valued voices in the ND FIRST process and will contribute to the development and success of ND FIRST implementation. These issues would need to be brought to the state legislature and not addressed through ND FIRST. If the issues you have stated are determined at the local level to be a root cause of</p>

	<p>slowed school improvement, some of these changes could be introduced in the Collaborative Partnership Agreement (MOU), school policy, and local funding.</p>
<p>Undermining Local Autonomy: A fundamental concern is that ND FIRST might override locally established goals and progress measurements, undermining the role of school boards and community-led decision-making. School boards, such as ours, act as a bridge between the community’s vision and the operational execution of schools, ensuring that district goals reflect local values. ND FIRST should better recognize and incorporate these local governance structures rather than impose uniform metrics and processes.</p> <p>Need for Child Development Expertise: ND FIRST appears to neglect vital aspects of child development theory, particularly the influences of a child’s environment and relationships, as emphasized by Bronfenbrenner’s theory. This theory highlights the need for tailored educational interventions based on the broader socio-ecological context of each child. Incorporating this developmental approach would make ND FIRST more robust and adaptable to individual student needs.</p> <p>ND FIRST needs to integrate local strategic goals and developmental theory, which will ensure that state interventions align with community priorities and support sustainable educational improvements.</p> <p>-----</p> <p>-----</p> <p>I am sure you have figured out by now that this form is being filled out by [DISTRICT*], because I have been having this conversation with the Department of Public Instruction for the last two years.</p> <p>As the Superintendent of a School district who can clearly demonstrate through own processes, data, and budget transparency that our resources and focus are clearly aligned to the outcomes we</p>	<p>ND FIRST is an accountability model required by both the state and federal government, as described in Senate Bill 2254. Customization is intentionally built into the model to reflect local school needs. However, ND FIRST does not overhaul or take over a school or district’s local initiatives; it is always encouraged that these local initiatives reflect local needs. All schools should be conducting routine root cause analyses in order to determine which research-backed initiatives make the most sense in the context of their school.</p> <p>NDDPI adjusted the language in the Collaborative Partnership Agreement (MOU) to clearly state that <i>“The ND FIRST school or district, with support from NDDPI and the ND FIRST teams, will revisit their root cause analysis to discern the primary factor(s) inhibiting school improvement, identify challenges or opportunities for growth, and identify assets that can be leveraged to address those opportunities.”</i> Thus, schools and districts are encouraged to identify approaches that best meet their local needs and context while aligning with state and federal academic outcome expectations.</p>

<p>have prioritized and value at a local level, knowing this will apply to one of our schools ([SCHOOL*]) is very frustrating. It's frustrating because this work will undermine the work we are doing by introducing other measures of success and strategies that may focus on outcomes we aren't tracking. Additionally, the concerns of our comparative accountability system and calculations that identify TSI/CSI schools have been shared with DPI in the past, including offering myself to help create more equitable accountability calculation documents.</p> <p>If this feedback is being read and taken seriously, I implore you to review the following [DISTRICT MATERIALS*].</p>	
<p>Well we know what they're going to do but they don't explain how in any of that.</p>	<p>The “how” is best explained in the ND FIRST Project Team Charter and the internal operational models. ND FIRST is an accountability model required by both the state and federal government, as described in Senate Bill 2254. The strategic framework and guidance documents provided demonstrate how NDDPI is implementing both state and federal accountability measures to support low performing schools achieve their improvement goals.</p>
<p>This plan is missing the root cause of poverty and trauma. What is clearly needed is for state support in early childhood years. Please use the funds for this purpose. It may be interesting to know for example, that a majority of Kindergarten students cannot count to ten when they start school. Schools know what to do, but many of the students start far below what would be expected of the age. Our teachers know how to teach and what to teach, but the students come to us so far behind. Please reconsider this plan and support early intervention.</p>	<p>All TSI and CSI schools undergo a local root cause analysis to determine what is impeding their improvement. This root cause analysis should be routine for <i>all</i> schools on a regular basis, not just those with TSI or CSI identification. Schools/districts eligible for ND FIRST would have findings from their root cause analyses to help identify where they need to target their support and how NDDPI and ND FIRST teams can support them.</p> <p>NDDPI adjusted the language in the Collaborative Partnership Agreement (MOU) to clearly state that <i>“The ND FIRST school or district, with support from NDDPI and the ND FIRST teams, will revisit their root cause analysis to discern the primary factor(s) inhibiting school improvement, identify challenges or opportunities for growth, and identify assets that can be leveraged to address those opportunities.”</i> Thus, schools and districts are encouraged to identify</p>

	approaches that best meet their local needs and context while aligning to state and federal academic outcome expectations.
<p>Thank you for seeking public comment on ND First.</p> <p>[PERSONAL INFORMATION*]</p> <p>As the product of a K-12 education in North Dakota, I present a perspective you might not typically hear. Allow me to elaborate...</p> <p>I grew up in [CITY*] and attended [SCHOOL*]. [SCHOOL*] was well known as being the least performing school in [CITY*]. Poverty & minority enrollment were high. Current test scores on niche.com indicate math proficiency is 25% and reading proficiency is 35%. Though it's not on the current CSI list, NDDPI's own numbers as available on insightsnd.gov put growth and achievement at [SCHOOL*] on the lower end of all elementary schools in North Dakota. When a principal in the district was assigned to [SCHOOL*] in the late 1970's, he famously said "I don't want to go there. Those kids won't amount to anything." [SCHOOL*] was truly on the wrong side of the tracks.</p> <p>In addition to growing up in a difficult neighborhood, I was an underperforming student. The end of my junior year of high school I had a .45 GPA. I managed to turn my academic performance around in my senior year and continue on.</p> <p>Upon reading the proposed ND First Guidance, I am struck by its lack of any basis in reality as to the reasons students underperform. The MOU for chronically underperforming schools includes the following changes to be implemented by DPI:</p> <ol style="list-style-type: none"> 1. Funds to be held in escrow administered by DPI. 2. Changes to curriculum, training, instruction, assessment, or the school calendar. 	<p>The courses of action you have cited come directly from Senate Bill 2254, the state legislation that <u>mandates</u> the implementation of a state and federal accountability model: ND FIRST. While these courses of action are limited, they do not encompass all that ND FIRST has the capacity to do. NDDPI has designed ND FIRST to help meet schools and districts where they are at through a strong partnership between the school/district and NDDPI and immense customization and flexibility.</p> <p>In some schools, the most meaningful change may be increased support for school staff. Teacher and school leader voices will be valued as part of developing the Collaborative Partnership Agreement (MOU). More importantly, teachers need to be supported during ND FIRST implementation. Thus, one of the consistent expectations for ND FIRST schools and districts in their initial 18 months of ND FIRST is, <i>"Engages in authentic personnel management, supervision, and evaluation processes for teachers, principals, and superintendent to generate the most effective feedback to support instruction."</i></p> <p>NDDPI will take your feedback into strong consideration when refining the language in the strategic framework documents to make the prioritization of teacher quality even more clear.</p>

<p>3. Reassignment or hiring of school or school district staff to fill roles associated with school or school district needs.</p> <p>If these three changes were enacted at my public schools when I was growing up in the 1980's/90's, these three items would have made absolutely no impact on my underperformance whatsoever. These policy changes would not have changed any of these items...</p> <ol style="list-style-type: none"> 1. The lack of financial resources experienced by our families. 2. The lack of vocational pride & meaningful community contribution that coincides with the lack of resources our families had. and perhaps the largest factor... 3. The broken home & family lives of me and my fellow students characterized by high levels of neglect & abuse, as well as divorce and substance abuse on the parts of our parents. <p>I believe the lawmakers at both Federal and State levels responsible for creating the legislation which have let to ND First are out of touch with the students and families of the schools they are attempting to improve.</p> <p>As an underperforming student in an underperforming school from a challenged family, there was only one thing that contributed to the positive path my life took. That is, whether or not the teachers and staff that surrounded me cared about me and loved me. That's it. The kids from the poor school who couldn't read or do math need people in their lives who care about them. They need teachers and staff who do not judge them or their families or who think less of them. They need teachers who will understand, encourage, and guide them. It's really that simple.</p>	
<p>The North Dakota education system needs to put out the message to local school administrators and superintendents that violence will not be tolerated in the classroom. Every single day my students are faced with peers that not only take away their ability to learn, but also</p>	<p>The root cause analysis phase is intended to identify what has been working and not working in individual CSI schools. NDDPI strongly believes each individual school has unique needs, which is why ND FIRST has been designed to be adaptive and customizable.</p>

<p>cause them to feel unsafe at school. Students cannot learn when they do not feel safe. My colleagues and I follow procedures every day to fill out behavior reports and notify admin of behaviors, and yet, these students are sent right back to the classroom.</p>	<p>NDDPI will always provide resources, professional development opportunities, and other support geared toward the topics you have mentioned. NDDPI believes that all students have the ability to learn and achieve their highest potential. NDDPI has embedded multi-tiered levels of support within our organization to support this ideal and will continue making it a priority in all aspects of our work.</p>
<p>I can tell you as someone who is very involved with an outstanding high performing school, it's too much. Be legendary coaches have told us that we are not doing enough. How disheartening for teachers and administrators who bust their butts to hear condescending comments like "what children are you going to choose to leave behind. "And "until adult behaviors change student outcomes won't change." This is coming from coaches helping Texas schools who have Ela rates in the Twenties. Which adult behaviors should change? Teachers at this school are often here until 430-5 pm. They take work home. They lose sleep over kids. We consistently score in the 80s and are told do better? Really?? DPI needs to critically reexamine this whole accountability push. I get this program is for the bottom tier schools, but a lot of schools are amazing and even the lower ones could do better with quality leaders who know how to get out of the way and let their amazing teachers do their thing! The Cognia, Marzano, all of it needs to go. Let local communities run and evaluate their schools.</p>	<p>ND FIRST is an accountability model required by both the state and federal government, as described in Senate Bill 2254.</p> <p>All TSI and CSI schools undergo a local root cause analysis to determine what is impeding their improvement. This root cause analysis should be routine for <i>all</i> schools on a regular basis, not just those with TSI or CSI identification. Schools/districts eligible for ND FIRST would have findings from their root cause analyses to help identify where they need to target their support and how NDDPI and ND FIRST teams can support them.</p> <p>In some schools, the most meaningful change may be increased support for school leaders and more autonomy for teachers. Teachers need to be supported during ND FIRST implementation. Thus, one of the consistent expectations for ND FIRST schools and districts in their initial 18 months of ND FIRST is to "[Engage] <i>in authentic personnel management, supervision, and evaluation processes for teachers, principals, and superintendent to generate the most effective feedback to support instruction.</i>"</p> <p>NDDPI will take your feedback into strong consideration when refining the language in the strategic framework documents to make the prioritization of personnel support even more clear.</p>
<p>You need to look at the whole picture. Home lives and outside factors that could be affecting the students' learning. They may have top notch teachers and access to great curriculum but outside factors could be impacting their learning.</p>	<p>ND FIRST is not intended to be a remedy for all issues a school may be facing. It is an accountability model required by both the state and federal government, as described in Senate Bill 2254. The strategic framework and guidance documents provided demonstrate how</p>

	<p>NDDPI is implementing both state and federal accountability measures to support low-performing schools in achieving their improvement goals.</p> <p>All TSI and CSI schools undergo a local root cause analysis to determine what is impeding their improvement. This root cause analysis should be routine for <i>all</i> schools on a regular basis, not just those with TSI or CSI identification. Schools/districts eligible for ND FIRST would have findings from their root cause analyses to help identify where they need to target their support and how NDDPI and ND FIRST teams can support them.</p> <p>NDDPI adjusted the language in the Collaborative Partnership Agreement (MOU) to clearly state that <i>“The ND FIRST school or district, with support from NDDPI and the ND FIRST teams, will revisit their root cause analysis to discern the primary factor(s) inhibiting school improvement, identify challenges or opportunities for growth, and identify assets that can be leveraged to address those opportunities.”</i> Thus, schools and districts are encouraged to identify approaches that best meet their local needs and context while aligning with state and federal academic outcome expectations.</p>
What else will be expected of schools to do to raise student achievement? Clearly the dashboard tells the story for most of the Native schools in ND.	The root cause analysis phase is intended to identify what has been working and not working in individual CSI schools. NDDPI strongly believes each individual school has unique needs, which is why ND FIRST has been designed to be adaptive and customizable.
We need to be careful of how much we are helping vs. "criticizing" our Native communities.	As stated in the Process Map, a core component of the Collaborative Partnership Agreement (MOU) is that it <i>“recognizes the local beliefs, values, and behaviors”</i> of the ND FIRST school or district. Each Collaborative Partnership Agreement (MOU) should acknowledge a school’s context and use that information to address its needs. ND FIRST is certainly not one-size-fits-all but rather allows for flexibility to address the needs of each and every learner. As a reminder, ND FIRST is the state and federal accountability model required for any public

	school receiving public funds. At any point, a school can choose to become a non-public or BIE-only entity.
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**NDDPI redacted this due to offensive or personally identifiable information.*