



# THE WASHINGTON STATE BOARD OF EDUCATION

Governance | Accountability | Achievement | Oversight | Career & College Readiness

<b>Title:</b>	<b>Public Hearing on Proposed Rules to Implement C 217 L 2014 (E2SSB 6552)</b>	
<b>As Related To:</b>	<input checked="" type="checkbox"/> Goal One: Effective and accountable P-13 governance. <input type="checkbox"/> Goal Two: Comprehensive statewide K-12 accountability. <input checked="" type="checkbox"/> Goal Three: Closing achievement gap.	<input type="checkbox"/> Goal Four: Strategic oversight of the K-12 system. <input checked="" type="checkbox"/> Goal Five: Career and college readiness for all students. <input type="checkbox"/> Other
<b>Relevant To Board Roles:</b>	<input checked="" type="checkbox"/> Policy Leadership <input type="checkbox"/> System Oversight <input type="checkbox"/> Advocacy	<input type="checkbox"/> Communication <input type="checkbox"/> Convening and Facilitating
<b>Policy Considerations / Key Questions:</b>	What changes, if any, should be made to proposed rules to implement E2SSB 6552, based on testimony received at the public hearing?	
<b>Possible Board Action:</b>	<input type="checkbox"/> Review <input type="checkbox"/> Adopt <input type="checkbox"/> Approve <input checked="" type="checkbox"/> Other	
<b>Materials Included in Packet:</b>	<input type="checkbox"/> Memo <input type="checkbox"/> Graphs / Graphics <input checked="" type="checkbox"/> Third-Party Materials <input type="checkbox"/> PowerPoint	
<b>Synopsis:</b>	<p>Chapter 217, Laws of 2014 (E2SSB 6552) requires the SBE to adopt rules to implement the Career and College Ready Graduation requirements adopted under board resolution on November 10, 2010 and revised January 9, 2014, to take effect, with certain modifications, with the graduating class of 2019. The act also revised instructional hour requirements for basic education and established new provisions on career and technical education (CTE) course equivalencies. In your packet you will find proposed:</p> <ul style="list-style-type: none"> <li>• Amended WAC 180-16-200. Total instructional hour requirements.</li> <li>• Amended WACs 180-51-066 and 180-51-067. Expired and current rules on high school graduation requirements.</li> <li>• New WAC 180-51-068. State subject and credit requirements for high school graduation. Students entering the ninth grade on or after July 1, 2015.</li> <li>• New WAC 180-16-200. District waiver from requirement on access to CTE course equivalencies.</li> <li>• Amended WAC 180-90-160. Private schools. Minimum standards and certificate form.</li> </ul> <p>In your packet you will also find:</p> <ul style="list-style-type: none"> <li>• Chapter 217, Laws of 2014 (E2SSB 6552)</li> <li>• CR 102 and OSPI fiscal impact statement</li> <li>• Public comments received on the proposed rules.</li> </ul>	

CERTIFICATION OF ENROLLMENT

**ENGROSSED SECOND SUBSTITUTE SENATE BILL 6552**

Chapter 217, Laws of 2014

(partial veto)

63rd Legislature  
2014 Regular Session

**K-12 EDUCATION--INSTRUCTIONAL HOUR AND GRADUATION REQUIREMENTS**

EFFECTIVE DATE: 06/12/14 - Except Sections 103 and 104, which become effective 09/01/15;  
and Section 206, which becomes effective 09/01/14.

Passed by the Senate March 13, 2014  
YEAS 45 NAYS 2

CERTIFICATE

BRAD OWEN

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—  
**President of the Senate**

Passed by the House March 12, 2014  
YEAS 93 NAYS 5

FRANK CHOPP

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—  
**Speaker of the House of Representatives**

I, Hunter G. Goodman, Secretary of the Senate of the State of Washington, do hereby certify that the attached is **ENGROSSED SECOND SUBSTITUTE SENATE BILL 6552** as passed by the Senate and the House of Representatives on the dates hereon set forth.

HUNTER G. GOODMAN

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—  
**Secretary**

Approved April 3, 2014, 11:39 a.m., with the exception of Section 207, which is vetoed.

FILED  
April 4, 2014

JAY INSLEE

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**Secretary of State  
State of Washington**

—  
**Governor of the State of Washington**

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**ENGROSSED SECOND SUBSTITUTE SENATE BILL 6552**

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AS AMENDED BY THE HOUSE

Passed Legislature - 2014 Regular Session

**State of Washington**

**63rd Legislature**

**2014 Regular Session**

**By Senate Ways & Means** (originally sponsored by Senators Rolfes, Dammeier, Litzow, Rivers, Tom, Fain, Hill, Kohl-Welles, Mullet, McAuliffe, and Cleveland)

READ FIRST TIME 02/11/14.

AN ACT Relating to improving student success by modifying instructional hour and graduation requirements; amending RCW 28A.700.070, 28A.230.097, 28A.230.010, 28A.150.220, 28A.230.090, 28A.230.097, 28A.320.240, and 28A.150.260; adding a new section to chapter 28A.305 RCW; adding a new section to chapter 43.06B RCW; creating new sections; providing effective dates; and providing an expiration date.

BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF WASHINGTON:

**NEW SECTION. Sec. 1** The legislature recognizes that preparing students to be successful in postsecondary education, gainful employment, and citizenship requires increased rigor and achievement, including attaining a meaningful high school diploma with the opportunity to earn twenty-four credits. The legislature finds that an investment was made in the 2013-2015 omnibus appropriations act to implement an increase in instructional hours in the 2014-2015 school year. School districts informed the legislature that the funding as provided in the 2013-2015 omnibus appropriations act would result in only a few minutes being added onto each class period and would not result in a meaningful increase in instruction that would have the positive impact on student learning that the legislature expects. The school districts suggested that it would be a better educational policy to use the funds to implement the requirement of twenty-four credits for high school graduation, which will result in a meaningful increase of instructional hours. Based on input from school districts across the state, the legislature recognizes the need to provide flexibility for school districts to implement the increase in instructional hours while still moving towards an increase in the high school graduation requirements. Therefore, the legislature intends to shift the focus and intent of the investments from compliance with the minimum instructional hours offering to assisting school districts to provide an opportunity for students to earn twenty-four credits for high school graduation and obtain a meaningful diploma, beginning with the

graduating class of 2019, with the opportunity for school districts to request a waiver for up to two years.

## **PART I CAREER AND TECHNICAL EQUIVALENCIES**

**Sec. 101** RCW 28A.700.070 and 2008 c 170 s 201 are each amended to read as follows:

- (1) The office of the superintendent of public instruction shall support school district efforts under RCW 28A.230.097 to adopt course equivalencies for career and technical courses by:
  - (a) Recommending career and technical curriculum suitable for course equivalencies;
  - (b) Publicizing best practices for high schools and school districts in developing and adopting course equivalencies; and
  - (c) In consultation with the Washington association for career and technical education, providing professional development, technical assistance, and guidance for school districts seeking to expand their lists of equivalent courses.
- (2) The office of the superintendent of public instruction shall provide professional development, technical assistance, and guidance for school districts to develop career and technical course equivalencies that also qualify as advanced placement courses.
- (3) The office of the superintendent of public instruction, in consultation with one or more technical working groups convened for this purpose, shall develop curriculum frameworks for a selected list of career and technical courses that may be offered by high schools or skill centers whose content in science, technology, engineering, and mathematics is considered equivalent in full or in part to science or mathematics courses that meet high school graduation requirements. The content of the courses must be aligned with state essential academic learning requirements in mathematics as adopted by the superintendent of public instruction in July 2011 and the essential academic learning requirements in science as adopted in October 2013, and industry standards. The office shall submit the list of equivalent career and technical courses and their curriculum frameworks to the state board of education for review, an opportunity for public comment, and approval. The first list of courses under this subsection must be developed and approved before the 2015-16 school year. Thereafter, the office may periodically update or revise the list of courses using the process in this subsection.
- (4) Subject to funds appropriated for this purpose, the office of the superintendent of public instruction shall allocate grant funds to school districts to increase the integration and rigor of academic instruction in career and technical courses. Grant recipients are encouraged to use grant funds to support teams of academic and technical teachers using a research-based professional development model supported by the national research center for career and technical education. The office of the superintendent of public instruction may require that grant recipients provide matching resources using federal Carl Perkins funds or other fund sources.

**Sec. 102** RCW 28A.230.097 and 2013 c 241 s 2 are each amended to read as follows:

- (1) Each high school or school district board of directors shall adopt course equivalencies for career and technical high school courses offered to students in high schools and skill centers. A career and technical course equivalency may be for whole or partial credit. Each school district board of directors shall develop a course equivalency approval procedure. Boards of directors must approve AP computer science courses as equivalent to high school mathematics or science, and must denote on a student's transcript that AP computer science qualifies as a math-based

quantitative course for students who take the course in their senior year. In order for a board to approve AP computer science as equivalent to high school mathematics, the student must be concurrently enrolled in or have successfully completed algebra II. Beginning no later than the 2015-16 school year, a school district board of directors must, at a minimum, grant academic course equivalency in mathematics or science for a high school career and technical course from the list of courses approved by the state board of education under RCW 28A.700.070, but is not limited to the courses on the list. If the list of courses is revised after the 2015-16 school year, the school district board of directors must grant academic course equivalency based on the revised list beginning with the school year immediately following the revision.

(2) Career and technical courses determined to be equivalent to academic core courses, in full or in part, by the high school or school district shall be accepted as meeting core requirements, including graduation requirements, if the courses are recorded on the student's transcript using the equivalent academic high school department designation and title. Full or partial credit shall be recorded as appropriate. The high school or school district shall also issue and keep record of course completion certificates that demonstrate that the career and technical courses were successfully completed as needed for industry certification, college credit, or preapprenticeship, as applicable. The certificate shall be either part of the student's high school and beyond plan or the student's culminating project, as determined by the student. The office of the superintendent of public instruction shall develop and make available electronic samples of certificates of course completion.

**Sec. 103** RCW 28A.230.010 and 2003 c 49 s 1 are each amended to read as follows:

(1) School district boards of directors shall identify and offer courses with content that meet or exceed: ~~((+))~~ (a) The basic education skills identified in RCW 28A.150.210; ~~((2))~~ (b) the graduation requirements under RCW 28A.230.090; ~~((3))~~ (c) the courses required to meet the minimum college entrance requirements under RCW 28A.230.130; and ~~((4))~~ (d) the course options for career development under RCW 28A.230.130. Such courses may be applied or theoretical, academic, or vocational.

(2) School district boards of directors must provide high school students with the opportunity to access at least one career and technical education course that is considered equivalent to a mathematics course or at least one career and technical education course that is considered equivalent to a science course as determined by the office of the superintendent of public instruction and the state board of education in RCW 28A.700.070. Students may access such courses at high schools, interdistrict cooperatives, skill centers or branch or satellite skill centers, or through online learning or applicable running start vocational courses.

(3) School district boards of directors of school districts with fewer than two thousand students may apply to the state board of education for a waiver from the provisions of subsection (2) of this section.

**NEW SECTION. Sec. 104** A new section is added to chapter 28A.305 RCW to read as follows: The state board of education may grant a waiver from the provisions of RCW 28A.230.010(2) based on an application from a board of directors of a school district with fewer than two thousand students.

**PART II**  
**INSTRUCTIONAL HOURS AND HIGH SCHOOL GRADUATION CREDIT**  
**REQUIREMENTS**

**Sec. 201** RCW 28A.150.220 and 2013 2nd sp.s. c 9 s 2 are each amended to read as follows:

(1) In order for students to have the opportunity to develop the basic education knowledge and skills under RCW 28A.150.210, school districts must provide instruction of sufficient quantity and quality and give students the opportunity to complete graduation requirements that are intended to prepare them for postsecondary education, gainful employment, and citizenship. The program established under this section shall be the minimum instructional program of basic education offered by school districts.

(2) Each school district shall make available to students the following minimum instructional offering each school year:

(a) For students enrolled in grades one through twelve, at least a district-wide annual average of one thousand hours, which shall be increased beginning in the 2015-16 school year to at least one thousand eighty instructional hours for students enrolled in ~~((each of))~~ grades ~~((seven))~~ nine through twelve and at least one thousand instructional hours for students in ~~((each of))~~ grades one through ~~((six according to an implementation schedule adopted by the legislature, but not before the 2014-15 school year))~~ eight, all of which may be calculated by a school district using a district-wide annual average of instructional hours over grades one through twelve; and

(b) For students enrolled in kindergarten, at least four hundred fifty instructional hours, which shall be increased to at least one thousand instructional hours according to the implementation schedule under RCW 28A.150.315.

(3) The instructional program of basic education provided by each school district shall include:

(a) Instruction in the essential academic learning requirements under RCW 28A.655.070;

(b) Instruction that provides students the opportunity to complete twenty-four credits for high school graduation, ~~((subject to a phased in implementation of the twenty-four credits as established by the legislature))~~ beginning with the graduating class of 2019 or as otherwise provided in RCW 28A.230.090. Course distribution requirements may be established by the state board of education under RCW 28A.230.090;

(c) If the essential academic learning requirements include a requirement of languages other than English, the requirement may be met by students receiving instruction in one or more American Indian languages;

(d) Supplemental instruction and services for underachieving students through the learning assistance program under RCW 28A.165.005 through 28A.165.065;

(e) Supplemental instruction and services for eligible and enrolled students and exited students whose primary language is other than English through the transitional bilingual instruction program under RCW 28A.180.010 through 28A.180.080;

(f) The opportunity for an appropriate education at public expense as defined by RCW 28A.155.020 for all eligible students with disabilities as defined in RCW 28A.155.020; and

(g) Programs for highly capable students under RCW 28A.185.010 through 28A.185.030.

(4) Nothing contained in this section shall be construed to require individual students to attend school for any particular number of hours per day or to take any particular courses.

(5)(a) Each school district's kindergarten through twelfth grade basic educational program shall be accessible to all students who are five years of age, as provided by RCW 28A.225.160, and less than twenty-one years of age and shall consist of a minimum of one hundred eighty school

days per school year in such grades as are conducted by a school district, and one hundred eighty half-days of instruction, or equivalent, in kindergarten, to be increased to a minimum of one hundred eighty school days per school year according to the implementation schedule under RCW 28A.150.315. ~~((However,))~~

(b) Schools administering the Washington kindergarten inventory of developing skills may use up to three school days at the beginning of the school year to meet with parents and families as required in the parent involvement component of the inventory. ~~((In addition, effective May 1, 1979,))~~

(c) In the case of students who are graduating from high school, a school district may schedule the last five school days of the one hundred ~~((and))~~ eighty day school year for noninstructional purposes ~~((in the case of students who are graduating from high school,))~~ including, but not limited to, the observance of graduation and early release from school upon the request of a student~~((, and))~~. All such students may be claimed as a full-time equivalent student to the extent they could otherwise have been so claimed for the purposes of RCW 28A.150.250 and 28A.150.260. Any hours scheduled by a school district for noninstructional purposes during the last five school days for such students shall count toward the instructional hours requirement in subsection (2)(a) of this section.

(6) Nothing in this section precludes a school district from enriching the instructional program of basic education, such as offering additional instruction or providing additional services, programs, or activities that the school district determines to be appropriate for the education of the school district's students.

(7) The state board of education shall adopt rules to implement and ensure compliance with the program requirements imposed by this section, RCW 28A.150.250 and 28A.150.260, and such related supplemental program approval requirements as the state board may establish.

**Sec. 202** RCW 28A.230.090 and 2011 c 203 s 2 are each amended to read as follows:

(1) The state board of education shall establish high school graduation requirements or equivalencies for students, except as provided in RCW 28A.230.122 and except those equivalencies established by local high schools or school districts under RCW 28A.230.097. The purpose of a high school diploma is to declare that a student is ready for success in postsecondary education, gainful employment, and citizenship, and is equipped with the skills to be a lifelong learner.

(a) Any course in Washington state history and government used to fulfill high school graduation requirements shall consider including information on the culture, history, and government of the American Indian peoples who were the first inhabitants of the state.

(b) The certificate of academic achievement requirements under RCW 28A.655.061 or the certificate of individual achievement requirements under RCW 28A.155.045 are required for graduation from a public high school but are not the only requirements for graduation.

(c) Any decision on whether a student has met the state board's high school graduation requirements for a high school and beyond plan shall remain at the local level. Effective with the graduating class of 2015, the state board of education may not establish a requirement for students to complete a culminating project for graduation.

(d)(i) The state board of education shall adopt rules to implement the career and college ready graduation requirement proposal adopted under board resolution on November 10, 2010, and revised on January 9, 2014, to take effect beginning with the graduating class of 2019 or as otherwise provided in this subsection (1)(d). The rules must include authorization for a school

district to waive up to two credits for individual students based on unusual circumstances and in accordance with written policies that must be adopted by each board of directors of a school district that grants diplomas. The rules must also provide that the content of the third credit of mathematics and the content of the third credit of science may be chosen by the student based on the student's interests and high school and beyond plan with agreement of the student's parent or guardian or agreement of the school counselor or principal.

(ii) School districts may apply to the state board of education for a waiver to implement the career and college ready graduation requirement proposal beginning with the graduating class of 2020 or 2021 instead of the graduating class of 2019. In the application, a school district must describe why the waiver is being requested, the specific impediments preventing timely implementation, and efforts that will be taken to achieve implementation with the graduating class proposed under the waiver. The state board of education shall grant a waiver under this subsection (1)(d) to an applying school district at the next subsequent meeting of the board after receiving an application.

(2)(a) In recognition of the statutory authority of the state board of education to establish and enforce minimum high school graduation requirements, the state board shall periodically reevaluate the graduation requirements and shall report such findings to the legislature in a timely manner as determined by the state board.

(b) The state board shall reevaluate the graduation requirements for students enrolled in vocationally intensive and rigorous career and technical education programs, particularly those programs that lead to a certificate or credential that is state or nationally recognized. The purpose of the evaluation is to ensure that students enrolled in these programs have sufficient opportunity to earn a certificate of academic achievement, complete the program and earn the program's certificate or credential, and complete other state and local graduation requirements.

(c) The state board shall forward any proposed changes to the high school graduation requirements to the education committees of the legislature for review and to the quality education council established under RCW 28A.290.010. The legislature shall have the opportunity to act during a regular legislative session before the changes are adopted through administrative rule by the state board. Changes that have a fiscal impact on school districts, as identified by a fiscal analysis prepared by the office of the superintendent of public instruction, shall take effect only if formally authorized and funded by the legislature through the omnibus appropriations act or other enacted legislation.

(3) Pursuant to any requirement for instruction in languages other than English established by the state board of education or a local school district, or both, for purposes of high school graduation, students who receive instruction in American sign language or one or more American Indian languages shall be considered to have satisfied the state or local school district graduation requirement for instruction in one or more languages other than English.

(4) If requested by the student and his or her family, a student who has completed high school courses before attending high school shall be given high school credit which shall be applied to fulfilling high school graduation requirements if:

(a) The course was taken with high school students, if the academic level of the course exceeds the requirements for seventh and eighth grade classes, and the student has successfully passed by completing the same course requirements and examinations as the high school students enrolled in the class; or

(b) The academic level of the course exceeds the requirements for seventh and eighth grade classes and the course would qualify for high school credit, because the course is similar or



equivalent to a course offered at a high school in the district as determined by the school district board of directors.

(5) Students who have taken and successfully completed high school courses under the circumstances in subsection (4) of this section shall not be required to take an additional competency examination or perform any other additional assignment to receive credit.

(6) At the college or university level, five quarter or three semester hours equals one high school credit.

**NEW SECTION. Sec. 203** The Washington state school directors' association shall adopt a model policy and procedure that school districts may use for granting waivers to individual students of up to two credits required for high school graduation based on unusual circumstances. The purpose of the model policy and procedure is to assist school districts in providing all students the opportunity to complete graduation requirements without discrimination and without disparate impact on groups of students. The model policy must take into consideration the unique limitations of a student that may be associated with such circumstances as homelessness, limited English proficiency, medical conditions that impair a student's opportunity to learn, or disabilities, regardless of whether the student has an individualized education program or a plan under section 504 of the federal rehabilitation act of 1973. The model policy must also address waivers if the student has not been provided with an opportunity to retake classes or enroll in remedial classes free of charge during the first four years of high school. The Washington state school directors' association must distribute the model policy and procedure to all school districts in the state that grant high school diplomas by June 30, 2015.

**Sec. 204** RCW 28A.230.097 and 2013 c 241 s 2 are each amended to read as follows:

(1) Each high school or school district board of directors shall adopt course equivalencies for career and technical high school courses offered to students in high schools and skill centers. A career and technical course equivalency may be for whole or partial credit. Each school district board of directors shall develop a course equivalency approval procedure. Boards of directors must approve AP computer science courses as equivalent to high school mathematics or science, and must denote on a student's transcript that AP computer science qualifies as a math-based quantitative course for students who take the course in their senior year. In order for a board to approve AP computer science as equivalent to high school mathematics, the student must be concurrently enrolled in or have successfully completed algebra II.

(2) Career and technical courses determined to be equivalent to academic core courses, in full or in part, by the high school or school district shall be accepted as meeting core requirements, including graduation requirements, if the courses are recorded on the student's transcript using the equivalent academic high school department designation and title. Full or partial credit shall be recorded as appropriate. The high school or school district shall also issue and keep record of course completion certificates that demonstrate that the career and technical courses were successfully completed as needed for industry certification, college credit, or preapprenticeship, as applicable. The certificate shall be ~~((either))~~ part of the student's high school and beyond plan ~~((or the student's culminating project, as determined by the student))~~. The office of the superintendent of public instruction shall develop and make available electronic samples of certificates of course completion.

**Sec. 205** RCW 28A.320.240 and 2006 c 263 s 914 are each amended to read as follows:

(1) The purpose of this section is to identify quality criteria for school library media programs that support the student learning goals under RCW 28A.150.210, the essential academic learning requirements under RCW 28A.655.070, and high school graduation requirements adopted under RCW 28A.230.090.

(2) Every board of directors shall provide for the operation and stocking of such libraries as the board deems necessary for the proper education of the district's students or as otherwise required by law or rule of the superintendent of public instruction.

(3) "Teacher-librarian" means a certified teacher with a library media endorsement under rules adopted by the professional educator standards board.

(4) "School-library media program" means a school-based program that is staffed by a certificated teacher-librarian and provides a variety of resources that support student mastery of the essential academic learning requirements in all subject areas and the implementation of the district's school improvement plan.

(5) The teacher-librarian, through the school-library media program, shall collaborate as an instructional partner to help all students meet the content goals in all subject areas, and assist high school students completing ~~((the culminating project and))~~ high school and beyond plans required for graduation.

**Sec. 206** RCW 28A.150.260 and 2011 1st sp.s. c 27 s 2 are each amended to read as follows:

The purpose of this section is to provide for the allocation of state funding that the legislature deems necessary to support school districts in offering the minimum instructional program of basic education under RCW 28A.150.220. The allocation shall be determined as follows:

(1) The governor shall and the superintendent of public instruction may recommend to the legislature a formula for the distribution of a basic education instructional allocation for each common school district.

(2) The distribution formula under this section shall be for allocation purposes only. Except as may be required under chapter 28A.155, 28A.165, 28A.180, or 28A.185 RCW, or federal laws and regulations, nothing in this section requires school districts to use basic education instructional funds to implement a particular instructional approach or service. Nothing in this section requires school districts to maintain a particular classroom teacher-to-student ratio or other staff-to-student ratio or to use allocated funds to pay for particular types or classifications of staff. Nothing in this section entitles an individual teacher to a particular teacher planning period.

(3)(a) To the extent the technical details of the formula have been adopted by the legislature and except when specifically provided as a school district allocation, the distribution formula for the basic education instructional allocation shall be based on minimum staffing and nonstaff costs the legislature deems necessary to support instruction and operations in prototypical schools serving high, middle, and elementary school students as provided in this section. The use of prototypical schools for the distribution formula does not constitute legislative intent that schools should be operated or structured in a similar fashion as the prototypes. Prototypical schools illustrate the level of resources needed to operate a school of a particular size with particular types and grade levels of students using commonly understood terms and inputs, such as class size, hours of instruction, and various categories of school staff. It is the intent that the funding allocations to school districts be adjusted from the school prototypes based on the actual number of annual average full-time equivalent students in each grade level at each school in the district

and not based on the grade-level configuration of the school to the extent that data is available. The allocations shall be further adjusted from the school prototypes with minimum allocations for small schools and to reflect other factors identified in the omnibus appropriations act.

(b) For the purposes of this section, prototypical schools are defined as follows:

(i) A prototypical high school has six hundred average annual full-time equivalent students in grades nine through twelve;

(ii) A prototypical middle school has four hundred thirty-two average annual full-time equivalent students in grades seven and eight; and

(iii) A prototypical elementary school has four hundred average annual full-time equivalent students in grades kindergarten through six.

(4)(a)(i) The minimum allocation for each level of prototypical school shall be based on the number of full-time equivalent classroom teachers needed to provide instruction over the minimum required annual instructional hours under RCW 28A.150.220 and provide at least one teacher planning period per school day, and based on the following general education average class size of full-time equivalent students per teacher:

General education

average class size

Grades K-3 . . . . . 25.23

Grade 4 . . . . . 27.00

Grades 5-6 . . . . . 27.00

Grades 7-8 . . . . . 28.53

Grades 9-12 . . . . . 28.74

(ii) The minimum class size allocation for each prototypical high school shall also provide for enhanced funding for class size reduction for two laboratory science classes within grades nine through twelve per full-time equivalent high school student multiplied by a laboratory science course factor of 0.0833, based on the number of full-time equivalent classroom teachers needed to provide instruction over the minimum required annual instructional hours in RCW 28A.150.220, and providing at least one teacher planning period per school day:

Laboratory science

average class size

Grades 9-12 . . . . . 19.98

(b) During the 2011-2013 biennium and beginning with schools with the highest percentage of students eligible for free and reduced-price meals in the prior school year, the general education average class size for grades K-3 shall be reduced until the average class size funded under this subsection (4) is no more than 17.0 full-time equivalent students per teacher beginning in the 2017-18 school year.

(c) The minimum allocation for each prototypical middle and high school shall also provide for full-time equivalent classroom teachers based on the following number of full-time equivalent students per teacher in career and technical education:

Career and technical

education average

class size

Approved career and technical education offered at  
the middle school and high school level . . . . . 26.57  
Skill center programs meeting the standards established  
by the office of the superintendent of public  
instruction . . . . . 22.76

- (d) In addition, the omnibus appropriations act shall at a minimum specify:
- (i) A high-poverty average class size in schools where more than fifty percent of the students are eligible for free and reduced-price meals; and
  - (ii) A specialty average class size for ((laboratory science,)) advanced placement((,)) and international baccalaureate courses.
- (5) The minimum allocation for each level of prototypical school shall include allocations for the following types of staff in addition to classroom teachers:

	Elementary School	Middle School	High School
Principals, assistant principals, and other certificated building-level administrators . . . . .	1.253	1.353	1.880
Teacher librarians, a function that includes information literacy, technology, and media to support school library media programs . . . . .	0.663	0.519	0.523
Health and social services:			
School nurses . . . . .	0.076	0.060	0.096
Social workers . . . . .	0.042	0.006	0.015
Psychologists . . . . .	0.017	0.002	0.007
Guidance counselors, a function that includes parent outreach and graduation advising . . . . .	0.493	1.116	((1.909)) <u>2.539</u>
Teaching assistance, including any aspect of educational instructional services provided by classified employees . . . . .	0.936	0.700	0.652
Office support and other noninstructional aides . . . . .	2.012	2.325	3.269
Custodians . . . . .	1.657	1.942	2.965
Classified staff providing student and staff safety . . . . .	0.079	0.092	0.141
Parent involvement coordinators . . . . .	0.00	0.00	0.00

(6)(a) The minimum staffing allocation for each school district to provide district-wide support services shall be allocated per one thousand annual average full-time equivalent students in grades K-12 as follows:

Staff per 1,000  
 K-12 students  
 Technology . . . . . 0.628  
 Facilities, maintenance, and grounds . . . . . 1.813  
 Warehouse, laborers, and mechanics . . . . . 0.332

(b) The minimum allocation of staff units for each school district to support certificated and classified staffing of central administration shall be 5.30 percent of the staff units generated under subsections (4)(a) and (b) and (5) of this section and (a) of this subsection.

(7) The distribution formula shall include staffing allocations to school districts for career and technical education and skill center administrative and other school-level certificated staff, as specified in the omnibus appropriations act.

(8)(a) Except as provided in (b) and (c) of this subsection, the minimum allocation for each school district shall include allocations per annual average full-time equivalent student for the following materials, supplies, and operating costs, to be adjusted for inflation from the 2008-09 school year:

Per annual average  
 full-time equivalent student  
 in grades K-12  
 Technology . . . . . \$54.43  
 Utilities and insurance . . . . . \$147.90  
 Curriculum and textbooks . . . . . \$58.44  
 Other supplies and library materials . . . . . \$124.07  
 Instructional professional development for certified and  
 classified staff . . . . . \$9.04  
 Facilities maintenance . . . . . \$73.27  
 Security and central office . . . . . \$50.76

(b) During the 2011-2013 biennium, the minimum allocation for maintenance, supplies, and operating costs shall be increased as specified in the omnibus appropriations act. The following allocations, adjusted for inflation from the 2007-08 school year, are provided in the 2015-16 school year, after which the allocations shall be adjusted annually for inflation as specified in the omnibus appropriations act:

Per annual average  
 full-time equivalent student  
 in grades K-12  
 Technology . . . . . \$113.80  
 Utilities and insurance . . . . . \$309.21  
 Curriculum and textbooks . . . . . \$122.17  
 Other supplies and library materials . . . . . \$259.39  
 Instructional professional development for certificated and  
 classified staff . . . . . \$18.89  
 Facilities maintenance . . . . . \$153.18

Security and central office administration . . . . . \$106.12

(c) In addition to the amounts provided in (a) and (b) of this subsection, beginning in the 2014-15 school year, the omnibus appropriations act shall provide the following minimum allocation for each annual average full-time equivalent student in grades nine through twelve for the following materials, supplies, and operating costs, to be adjusted annually for inflation:

Per annual average  
full-time equivalent student  
in grades 9-12  
Technology . . . . . \$36.35  
Curriculum and textbooks . . . . . \$39.02  
Other supplies and library materials . . . . . \$82.84  
Instructional professional development for certificated and  
classified staff . . . . . \$6.04

(9) In addition to the amounts provided in subsection (8) of this section, the omnibus appropriations act shall provide an amount based on full-time equivalent student enrollment in each of the following:

- (a) Exploratory career and technical education courses for students in grades seven through twelve;
- ~~(b) ((Laboratory science courses for students in grades nine through twelve;~~
- ~~(e))~~ Preparatory career and technical education courses for students in grades nine through twelve offered in a high school; and
- ~~((d))~~ (c) Preparatory career and technical education courses for students in grades eleven and twelve offered through a skill center.

(10) In addition to the allocations otherwise provided under this section, amounts shall be provided to support the following programs and services:

- (a) To provide supplemental instruction and services for underachieving students through the learning assistance program under RCW 28A.165.005 through 28A.165.065, allocations shall be based on the district percentage of students in grades K-12 who were eligible for free or reduced-price meals in the prior school year. The minimum allocation for the program shall provide for each level of prototypical school resources to provide, on a statewide average, 1.5156 hours per week in extra instruction with a class size of fifteen learning assistance program students per teacher.
- (b) To provide supplemental instruction and services for students whose primary language is other than English, allocations shall be based on the head count number of students in each school who are eligible for and enrolled in the transitional bilingual instruction program under RCW 28A.180.010 through 28A.180.080. The minimum allocation for each level of prototypical school shall provide resources to provide, on a statewide average, 4.7780 hours per week in extra instruction with fifteen transitional bilingual instruction program students per teacher. Notwithstanding other provisions of this subsection (10), the actual per-student allocation may be scaled to provide a larger allocation for students needing more intensive intervention and a commensurate reduced allocation for students needing less intensive intervention, as detailed in the omnibus appropriations act.

(c) To provide additional allocations to support programs for highly capable students under

RCW 28A.185.010 through 28A.185.030, allocations shall be based on two and three hundred fourteen one-thousandths percent of each school district's full-time equivalent basic education enrollment. The minimum allocation for the programs shall provide resources to provide, on a statewide average, 2.1590 hours per week in extra instruction with fifteen highly capable program students per teacher.

(11) The allocations under subsections (4)(a) and (b), (5), (6), and (8) of this section shall be enhanced as provided under RCW 28A.150.390 on an excess cost basis to provide supplemental instructional resources for students with disabilities.

(12)(a) For the purposes of allocations for prototypical high schools and middle schools under subsections (4) and (10) of this section that are based on the percent of students in the school who are eligible for free and reduced-price meals, the actual percent of such students in a school shall be adjusted by a factor identified in the omnibus appropriations act to reflect underreporting of free and reduced-price meal eligibility among middle and high school students.

(b) Allocations or enhancements provided under subsections (4), (7), and (9) of this section for exploratory and preparatory career and technical education courses shall be provided only for courses approved by the office of the superintendent of public instruction under chapter 28A.700 RCW.

(13)(a) This formula for distribution of basic education funds shall be reviewed biennially by the superintendent and governor. The recommended formula shall be subject to approval, amendment or rejection by the legislature.

(b) In the event the legislature rejects the distribution formula recommended by the governor, without adopting a new distribution formula, the distribution formula for the previous school year shall remain in effect.

(c) The enrollment of any district shall be the annual average number of full-time equivalent students and part-time students as provided in RCW 28A.150.350, enrolled on the first school day of each month, including students who are in attendance pursuant to RCW 28A.335.160 and 28A.225.250 who do not reside within the servicing school district. The definition of full-time equivalent student shall be determined by rules of the superintendent of public instruction and shall be included as part of the superintendent's biennial budget request. The definition shall be based on the minimum instructional hour offerings required under RCW 28A.150.220. Any revision of the present definition shall not take effect until approved by the house ways and means committee and the senate ways and means committee.

(d) The office of financial management shall make a monthly review of the superintendent's reported full-time equivalent students in the common schools in conjunction with RCW 43.62.050.

***\*NEW SECTION. Sec. 207 A new section is added to chapter 43.06B RCW to read as follows:***

***(1) The office of the education ombuds shall convene a task force on success for students with special needs to:***

***(a) Define and assess barriers that students with special needs face in earning a high school diploma and fully accessing the educational program provided by the public schools, including but not limited to students with disabilities, dyslexia, and other physical or emotional conditions for which students do not have an individualized education program or section 504 plan but that create limitations to their ability to succeed in school;***

***(b) Outline recommendations for systemic changes to address barriers identified and successful models for the delivery of education and supportive services for students with***

*special needs;*

*(c) Recommend steps for coordination of delivery of early learning through postsecondary education and career preparation for students with special needs through ongoing efforts of various state and local education and workforce agencies, including strategies for earlier assessment and identification of disabilities or barriers to learning in early learning programs and in kindergarten through third grade; and*

*(d) Identify options for state assistance to help school districts develop course equivalencies for competency-based education or similar systems of personalized learning where students master specific knowledge and skills at their own pace.*

*(2) The task force shall be composed of at least the following members:*

*(a) One representative each from the office of the superintendent of public instruction, the workforce training and education coordinating board, the Washington state school directors' association, a statewide organization representing teachers and other certificated instructional staff, the student achievement council, the state board of education, the department of early learning, the educational opportunity gap oversight and accountability committee, a nonprofit organization providing professional development and resources for educators and parents regarding dyslexia, a nonprofit organization of special education parents and teachers, and the Washington association for career and technical education, each to be selected by the appropriate agency or organization; and*

*(b) At least one faculty member from a public institution of higher education, at least one special education teacher, at least one general education teacher, and at least three parent representatives from special needs families, each to be appointed by the education ombuds.*

*(3) The office of the education ombuds shall submit an initial report to the superintendent of public instruction, the governor, and the legislature by December 15, 2014, and December 15th of each year thereafter until 2016 detailing its recommendations, including recommendations for specific strategies, programs, and potential changes to funding or accountability systems that are designed to close the opportunity gap, increase high school graduation rates, and assure students with special needs are fully accessing the educational program provided by the public schools.*

*(4) This section expires June 30, 2017.*

*\*Sec. 207 was vetoed. See message at end of chapter.*

NEW SECTION. Sec. 208 Sections 103 and 104 of this act take effect September 1, 2015.

NEW SECTION. Sec. 209 Section 206 of this act takes effect September 1, 2014.

Passed by the Senate March 13, 2014.

Passed by the House March 12, 2014.

Approved by the Governor April 3, 2014, with the exception of certain items that were vetoed.

Filed in Office of Secretary of State April 4, 2014.

Note: Governor's explanation of partial veto is as follows:

"I am returning herewith, without my approval as to Section 207, Engrossed Second Substitute



Senate Bill No. 6552 entitled:

"AN ACT Relating to improving student success by modifying instructional hour and graduation requirements."

Section 207 of the bill directs the Office of the Education Ombuds to convene a three-year task force on students with special needs to examine barriers to earning a diploma.

Later this week I will sign the 2014 supplemental budget, Engrossed Substitute Senate Bill 6002, which includes a similar directive for the Office of Education Ombuds. As that provision of the budget is implemented, it is important that my ombuds office work closely with the Office of the Superintendent of Public Instruction and stakeholders to improve education programs and support success for special education students--and all students. Section 207 creates unnecessary duplication.

For these reasons I have vetoed Section 207 of Engrossed Second Substitute Senate Bill No. 6552.

With the exception of Section 207, Engrossed Second Substitute Senate Bill No. 6552 is approved."



## WASHINGTON STATE BOARD OF EDUCATION AMENDED RESOLUTION TO APPROVE WASHINGTON STATE GRADUATION REQUIREMENT FRAMEWORK: CAREER AND COLLEGE READY

**As Approved January 9, 2014**

WHEREAS, Our children are our state's future and our education system must prepare them now for the continuing challenges of the 21<sup>st</sup> century, and

WHEREAS, All students deserve an excellent and equitable education, and

WHEREAS, We must join together to support students in our education system and to provide the resources and direction needed to help all students succeed in meeting their educational and career goals, and

WHEREAS, Washington's Basic Education Act provides direction by stating that school districts must provide instruction of sufficient quantity and quality and give students the opportunity to complete high school graduation requirements that are intended to prepare them for postsecondary education, gainful employment, and citizenship, and

WHEREAS, The State Board of Education provides direction through its rule-making authority for state graduation requirements, including subject-area credits, a High School and Beyond Plan, and a Culminating Project by all students, and

WHEREAS, The State Board of Education recognizes that the Legislature must formally authorize and fund changes to graduation requirements that have a fiscal impact on school districts before they may take effect, per RCW 28A.230.090(2)(c), and

WHEREAS, Washington State is in the bottom 20 percent of all states in participation of students ages 18-24 in education beyond high school, particularly low-income students, and many high school graduates of color are less likely to go directly to community/technical and four-year colleges, and

WHEREAS, Washington State graduation requirements for science are significantly lower than the majority of other states, as were state requirements for English and social studies until the State Board of Education implemented new graduation requirements for the Class of 2016, and

WHEREAS, The State Board of Education has listened to stakeholders and revised its graduation credit requirements proposal in response to the feedback received, and

WHEREAS, The State Board of Education has determined over a multi-year period of study that Washington's current state graduation requirements need to be strengthened so that students are prepared for the education and training needed to earn a credential beyond high school considered necessary for most living-wage jobs in the 21<sup>st</sup> century, and

WHEREAS, The State Board of Education places equal value on multiple pathways to career and college readiness, and calls for students, parents/guardians and local educators to work together on High School and Beyond Plans that will guide students' course selections through high school and evolve as students' goals develop and change, and

WHEREAS, The State Board of Education places significant value on the opportunity for high school students to pursue professional/technical certificates through a skill center or high school Career and Technical Education program during their high school career, and

WHEREAS, The State Board of Education recognizes the value of flexibility in students' high school course choices, with flexible credits including electives and Personalized Pathway Requirements, and

WHEREAS, The 2013 Legislature appropriated funding to support implementation of the opportunity to earn 24 credits, and

WHEREAS, Presuming the 2014 Legislature enacts the State Board of Education framework with funding, it is the Board's intent that the new graduation requirements will apply beginning with the high school graduating class of 2019. This phase-in period will allow ample time for planning and implementation details as well as required rules to be developed with stakeholder input, and

THEREFORE, BE IT RESOLVED THAT The State Board of Education is approving an amended career and college-ready graduation requirement framework that will allow all students to pursue personalized post-secondary pathways. These post-secondary pathways will be locally determined, but must include at least the following options for high school and skill center students:

- To pursue a professional/technical certificate or degree at a community or technical college.
- To pursue a four-year degree at a college, university, or college transfer program (students' high school classes should align with the Washington Student Achievement Council's College Admission Standards).

Each high school student will identify their post-secondary pathway in their High School and Beyond Plan.

The subject credit requirements are as follows:

English: 4 credits

Math: 3 credits

Science, 2 labs: 3 credits

Social Studies: 3 credits

Health: .5 credit

Career and Technical Education: 1 credit\*\*

Fitness: 1.5 credits

Arts: 2 credits\*\*\* (one may be a Personalized Pathway Requirement\*)

World Languages (required if on a four-year degree pathway) or Personalized Pathway Requirement\*: 2 credits

Electives: 4 credits

\* Personalized Pathway Requirements are related courses that lead to a specific post high school career or educational outcome chosen by the student based on the student's interests and High School and Beyond Plan, that may include Career and Technical Education, and are intended to provide a focus for the student's learning.

\*\*or 1 Occupational Education credit, as defined in WAC 180-51-067.

\*\*\*Only 1 credit in arts may be substituted for a Personalized Pathway Requirement.

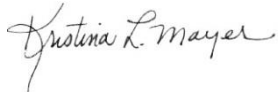
While students must attempt 24 credits, up to two of the 24 credits may be waived by local administrators if students need to retake courses to fulfill the 17 core state requirements that all students must meet, and

BE IT FURTHER RESOLVED THAT The State Board of Education will continue to reexamine the role of the High School and Beyond plan and the Culminating Project in career and postsecondary planning and preparation, and to ensure greater consistency across districts, and

BE IT FURTHER RESOLVED THAT the State Board of Education recognizes that K-12 students would benefit from increased flexibility in course equivalency, further opportunities for meeting two graduation requirements while earning one credit, and increased opportunities for earning competency credit; the Board will encourage both the Legislature and school districts to facilitate such flexibility.

BE IT FURTHER RESOLVED THAT the State Board of Education will work with institutions of higher education for expanding recognition of high school classes as meeting admission requirements.

BE IT FURTHER RESOLVED THAT the Board will track the relevant data to assess the efficacy of the graduation policy over time. It will annually review course-taking and other appropriate data by subgroups used in the Achievement Index so it can determine if the new requirements are indeed helping more students graduate career and college ready.



Dr. Kristina Mayer, Chair  
January 9, 2014

**WASHINGTON STATE BOARD OF EDUCATION RESOLUTION TO APPROVE WASHINGTON  
STATE GRADUATION REQUIREMENTS:  
CAREER AND COLLEGE READY**

**As Approved November 10, 2010**

WHEREAS, Our children are our state's future and our education system must prepare them now for the challenges of the 21<sup>st</sup> century, and

WHEREAS, All students deserve an excellent and equitable education, and

WHEREAS, We must join together to support students in our education system and to provide the resources and direction needed to help all students succeed in meeting their educational and career goals, and

WHEREAS, Washington's Basic Education Act provides direction by stating that school districts must provide instruction of sufficient quantity and quality and give students the opportunity to complete graduation requirements that are intended to prepare them for postsecondary education, gainful employment, and citizenship, and

WHEREAS, The State Board of Education provides direction through its rule-making authority for state graduation requirements, including subject-area credits, a High School and Beyond Plan, and a Culminating Project of all students, and

WHEREAS, The State Board of Education recognizes that the Legislature must approve and fund changes to graduation requirements that have state fiscal impact, and

WHEREAS, Despite a considerably changed world over the past 25 years, Washington students in the graduating class of 2011 are graduating under the same state credit requirements expected for the graduating class of 1985, and

WHEREAS, Washington State is in the bottom 20 percent of all states in participation of students ages 18-24 in education beyond high school, particularly low-income students, and many high school graduates of color are less likely to go directly to community/technical and four-year colleges, and

WHEREAS, Washington State graduation requirements for English, science, and social studies are significantly lower than the majority of other states, and

WHEREAS, The State Board of Education has listened to stakeholders and the recommendations of its Core 24 Implementation Task Force and revised its graduation credit requirements proposal in response to the feedback received, and

WHEREAS, The State Board of Education has determined over a three-year period of study that Washington's current state graduation requirements need to be strengthened so that students are prepared for the education and training needed to earn a credential beyond high school considered necessary for most living-wage jobs in the 21<sup>st</sup> century, and

WHEREAS, The State Board of Education places equal value on multiple pathways to career and college readiness, and calls for students, parents/guardians and local educators to work together on

High School and Beyond Plans that will guide students' course selections through high school and evolve as students' goals develop and change, and

THEREFORE, BE IT RESOLVED THAT The State Board of Education is approving a new set of career and college-ready graduation requirements. All students will be enrolled in a common pathway that will keep all postsecondary options open and will align with the Higher Education Coordinating Board's minimum four-year public college admission requirements unless students substitute courses according to their High School and Beyond Plans:

English: 4 credits  
Math: 3 credits  
Science, 2 labs: 3 credits  
Social Studies: 3 credits  
Health: .5 credit  
Occupational Education: 1 credit  
Fitness: 1.5 credits\*  
Arts: 2 credits\*\*  
World Languages: 2 credits\*  
Career Concentration: 2 credits\*  
Electives: 2 credits\*

\*Subjects that are asterisked have flexibility, either because of state law (e.g., students may be excused from fitness) or because the State Board of Education is allowing students to make choices that will enable them to pursue courses more consistent with the educational and career goals expressed in their High School and Beyond Plans. \*\*Only 1 credit may be substituted in arts.

While students must attempt 24 credits, up to two of the 24 credits may be waived by local administrators if students need to retake courses to fulfill the state requirements, and

BE IT FURTHER RESOLVED THAT The State Board of Education will make changes to the high school and beyond plan and the Culminating Project to assure greater consistency of implementation across districts, and

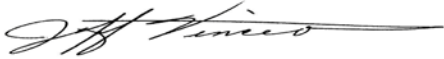
BE IT FURTHER RESOLVED THAT It is the State Board of Education's intention, after the 2011 legislative session, to put those policy changes with no state fiscal impact, as determined by the Office of Superintendent of Public Instruction, into effect for the graduating class of 2016. Within the current 20 credit framework, the following credit changes would be made:

- Increase English from 3 to 4 credits
- Increase Social Studies from 2.5 to 3 credits, including .5 credits of civics
- Designate .5 credit of health (while retaining 1.5 credits of fitness)
- Decrease elective credits by 1.5

BE IT FURTHER RESOLVED THAT The State Board of Education will enact additional, no-cost policies, as determined by the Office of Superintendent of Public Instruction, to create more flexibility for districts to help students meet the graduation requirements. These policies would go into effect for the graduating class of 2016.

1. Remove the 150 hour definition of a credit and permit districts to establish policies that specify how they will know students have successfully completed the state's subject area content expectations sufficiently to earn a credit.
2. Establish a "two for one" policy to enable students to take a CTE-equivalent course and satisfy two requirements (one course = one credit = two requirements).
3. Make Washington State History and Government a non-credit requirement that must be successfully passed and noted on the student transcript that the requirement has been met.

BE IT FURTHER RESOLVED that all other changes to the requirements, including initiating the high school and beyond plan at the middle level, will be put into effect pending legislative approval and funding.



Jeff Vincent, Chair

November 10, 2010

Date

AMENDATORY SECTION (Amending WSR 01-24-092, filed 12/4/01, effective 1/4/02)

**WAC 180-16-200 Total instructional hour requirement.** (1)((a))  
Kindergarten total instructional hour requirement - Four hundred fifty hours annual minimum, increased to an annual minimum one thousand instructional hours according to an implementation schedule under RCW 28A.150.315. ((See RCW 28A.150.220 (1)(a).) (b))

(2) Grades 1-12 total instructional hour requirement - District-wide annual average of one thousand hours. ((See RCW 28A.150.220 (1)(b).) In grades one through twelve school districts may arrange their calendars in any way they determine as long as the district wide annual average instructional hour requirement is at least one thousand hours.

(2) The basic education program requirements shall be as described under RCW 28A.150.220(1)), increased beginning in the 2015-16 school year to:

(a) At least a district-wide average of one thousand eighty instructional hours for students enrolled in grades nine through twelve and a district-wide annual average of one thousand instructional hours in grades one through eight; or

(b) A district-wide annual average of one thousand twenty-seven instructional hours in grades one through twelve.

(3) For nonhigh school districts, a district-wide annual average of one thousand instructional hours in such grades as are offered by the district.



**WAC 180-51-066 Minimum requirements for high school graduation—Students entering the ninth grade on or after July 1, 2009, through June 30, 2012.** (1) The statewide minimum subject areas and credits required for high school graduation for students who enter the ninth grade or begin the equivalent of a four-year high school program as of July 1, 2009, through June 30, 2012, shall total twenty as listed below.

(a) Three **English** credits (reading, writing, and communications) that at minimum align with grade level expectations for ninth and tenth grade, plus content that is determined by the district. Assessment shall include the tenth grade Washington assessment of student learning beginning 2008.

(b) Three **mathematics** credits that align with the high school mathematics standards as developed and revised by the office of superintendent of public instruction and satisfy the requirements set forth below:

(i) Unless otherwise provided for in (b)(iv) through (vii) of this subsection, the three mathematics credits required under this section must include:

- (A) Algebra 1 or integrated mathematics I;
- (B) Geometry or integrated mathematics II; and
- (C) Algebra 2 or integrated mathematics III.

(ii) A student may elect to pursue a third credit of high school-level mathematics, other than algebra 2 or integrated mathematics III if all of the following requirements are met:

(A) The student's elective choice is based on a career oriented program of study identified in the student's high school and beyond plan that is currently being pursued by the student;

(B) The student's parent(s)/guardian(s) (or designee for the student if a parent or guardian is unavailable) agree that the third credit of mathematics elected is a more appropriate course selection than algebra 2 or integrated mathematics III because it will better serve the student's education and career goals;

(C) A meeting is held with the student, the parent(s)/guardian(s) (or designee for the student if a parent or guardian is unavailable), and a high school representative for the purpose of discussing the student's high school and beyond plan and advising the student of the requirements for credit bearing two- and four-year college level mathematics courses; and

(D) The school has the parent(s)/guardian(s) (or designee for the student if a parent or guardian is unavailable) sign a form acknowledging that the meeting with a high school representative has occurred, the information as required was discussed, and the parent(s)/guardian(s) (or designee for the student if a parent or guardian is unavailable) agree that the third credit of mathematics elected is a more appropriate course selection given the student's education and career goals.

(iii) Courses in (b)(i) and (ii) of this subsection may be taken currently in the following combinations:

(A) Algebra 1 or integrated mathematics I may be taken concurrently with geometry or integrated mathematics II.

(B) Geometry or integrated mathematics II may be taken concurrently with algebra 2 or integrated mathematics III or a third credit of mathematics to the extent authorized in (b)(ii) of this subsection.

(iv) Equivalent career and technical education (CTE) mathematics courses meeting the requirements set forth in RCW 28A.230.097 can be taken for credit instead of any of the mathematics courses set forth in (b)(i) of this subsection if the CTE mathematics courses are recorded on the student's transcript using the equivalent academic high school department designation and course title.

(v) A student who prior to ninth grade successfully completed algebra 1 or integrated mathematics I; and/or geometry or integrated mathematics II, but does not request high school credit for such course(s) as provided in RCW 28A.230.090, may either:

(A) Repeat the course(s) for credit in high school; or

(B) Complete three credits of mathematics as follows:

(I) A student who has successfully completed algebra 1 or integrated mathematics I shall:

- Earn the first high school credit in geometry or integrated mathematics II;

- Earn the second high school credit in algebra 2 or integrated mathematics III; and

- Earn the third high school credit in a math course that is consistent with the student's education and career goals.

(II) A student who has successfully completed algebra 1 or integrated mathematics I, and geometry or integrated mathematics II, shall:

- Earn the first high school credit in algebra 2 or integrated mathematics III; and

- Earn the second and third credits in mathematics courses that are consistent with the educational and career goals of the student.

(vi) A student who satisfactorily demonstrates competency in algebra 1 or integrated mathematics I pursuant to a written district policy, but does not receive credit under the provisions of WAC 180-51-050, shall complete three credits of high school mathematics in the following sequence:

- Earn the first high school credit in geometry or integrated mathematics II;

- Earn the second high school credit in algebra 2 or integrated mathematics III; and

- Earn the third credit in a mathematics course that is consistent with the student's education and career goals.

(vii) A student who satisfactorily demonstrates competency in algebra 1 or integrated mathematics I and geometry or integrated mathematics II pursuant to a written district policy, but does not receive credit for the courses under the provisions of WAC 180-51-050, shall complete three credits of high school mathematics in the following sequence:

- Earn the first high school credit in algebra 2 or integrated mathematics III;

- Earn the second and third high school credits in courses that are consistent with the educational and career goals of the student.

(c) Two **science** credits (physical, life, and earth) that at minimum align with grade level expectations for ninth and tenth grade, plus content that is determined by the district. At least one credit in laboratory science is required which shall be defined locally. Assessment shall include the tenth grade Washington assessment of student learning beginning 2010.

(d) Two and one-half **social studies** credits that at minimum align with the state's essential academic learning requirements in civics, economics, geography, history, and social studies skills at grade ten and/or above plus content that is determined by the district. The assessment of achieved competence in this subject area is to be determined by the local district although state law requires districts to have "assessments or other strategies" in social studies at the high school level by 2008-09. In addition, districts shall require students to complete a classroom-based assessment in civics in the eleventh or twelfth grade also by 2008-09. The state superintendent's office has developed classroom-based assessment models for districts to use (RCW 28A.230.095). The social studies requirement shall consist of the following mandatory courses or equivalencies:

(i) One credit shall be required in United States history and government which shall include study of the Constitution of the United States. No other course content may be substituted as an equivalency for this requirement.

(ii) Under the provisions of RCW 28A.230.170 and 28A.230.090, one-half credit shall be required in Washington state history and government which shall include study of the Constitution of the state of Washington and is encouraged to include information on the culture, history, and government of the American Indian people who were the first inhabitants of the state.

(A) For purposes of the Washington state history and government requirement only, the term "secondary student" shall mean a student who is in one of the grades seven through twelve. If a district offers this course in the seventh or eighth grade, it can still count towards the state history and government graduation requirement. However, the course should only count as a high school credit if the academic level of the course exceeds the requirements for seventh and eighth grade classes and the course would qualify for high school credit, because the course is similar or equivalent to a course offered at a high school in the district as determined by the school district board of directors (RCW 28A.230.090(4)).

(B) The study of the United States and Washington state Constitutions shall not be waived, but may be fulfilled through an alternative learning experience approved by the local school principal under written district policy.

(C) Secondary school students who have completed and passed a state history and government course of study in another state may have the Washington state history and government requirement waived by their principal. The study of the United States and Washington state Constitutions required under RCW 28A.230.170 shall not be waived, but may be fulfilled through an alternative learning experience approved by the school principal under a written district policy.

(D) After completion of the tenth grade and prior to commencement of the eleventh grade, eleventh and twelfth grade students who transfer from another state, and who have or will have earned two credits in social studies at graduation, may have the Washington state history requirement waived by their principal if without such a waiver they will not be able to graduate with their class.

(iii) One credit shall be required in contemporary world history, geography, and problems. Courses in economics, sociology, civics, political science, international relations, or related courses with emphasis on current problems may be accepted as equivalencies.

(e) Two **health and fitness** credits that at minimum align with current essential academic learning requirements at grade ten and/or

above plus content that is determined by the local school district. The assessment of achieved competence in this subject area is to be determined by the local district although state law requires districts to have "assessments or other strategies" in health and fitness at the high school level by 2008-09. The state superintendent's office has developed classroom-based assessment models for districts to use (RCW 28A.230.095).

(i) The fitness portion of the requirement shall be met by course work in fitness education. The content of fitness courses shall be determined locally under WAC 180-51-025. Suggested fitness course outlines shall be developed by the office of the superintendent of public instruction. Students may be excused from the physical portion of the fitness requirement under RCW 28A.230.050. Such excused students shall be required to substitute equivalency credits in accordance with policies of boards of directors of districts, including demonstration of the knowledge portion of the fitness requirement.

(ii) "Directed athletics" shall be interpreted to include community-based organized athletics.

(f) One **arts** credit that at minimum is aligned with current essential academic learning requirements at grade ten and/or above plus content that is determined by the local school district. The assessment of achieved competence in this subject area is to be determined by the local district although state law requires districts to have "assessments or other strategies" in arts at the high school level by 2008-09. The state superintendent's office has developed classroom-based assessment models for districts to use (RCW 28A.230.095). The essential content in this subject area may be satisfied in the visual or performing arts.

(g) One credit in **occupational education**. "Occupational education" means credits resulting from a series of learning experiences designed to assist the student to acquire and demonstrate competency of skills under student learning goal four and which skills are required for success in current and emerging occupations. At a minimum, these competencies shall align with the definition of an exploratory course as proposed or adopted in the career and technical education program standards of the office of the superintendent of public instruction. The assessment of achieved competence in this subject area is determined at the local district level.

(h) Five and one-half electives: Study in a world language other than English or study in a world culture may satisfy any or all of the required electives. The assessment of achieved competence in these subject areas is determined at the local district level.

(i) Each student entering ninth grade before July 1, 2010, and graduating before 2015 shall complete a culminating project for graduation. The project shall consist of the student demonstrating both their learning competencies and preparations related to learning goals three and four. Each district shall define the process to implement this graduation requirement, including assessment criteria, in written district policy.

(j) Each student shall have a high school and beyond plan for their high school experience, including what they expect to do the year following graduation.

(k) Each student shall attain a certificate of academic achievement or certificate of individual achievement. The tenth grade Washington assessment of student learning and Washington alternate assessment system shall determine attainment.

(2) State board of education approved private schools under RCW 28A.305.130(5) may, but are not required to, align their curriculums with the state learning goals under RCW 28A.150.210 or the essential academic learning requirements under RCW 28A.655.070.

AMENDATORY SECTION (Amending WSR 12-03-073, filed 1/13/12, effective 2/13/12)

**WAC 180-51-067 State subject and credit requirements for high school graduation—Students entering the ninth grade on or after July 1, 2012, through June 30, 2015.** The statewide subject areas and credits required for high school graduation, beginning July 1, 2012, for students who enter the ninth grade or begin the equivalent of a four-year high school program, as of July 1, 2012, through June 30, 2015, except as provided in WAC 180-51-068(11), shall total twenty as provided below. All credits are to be aligned with the state's essential academic learning requirements (learning standards) for the subject. The content of any course shall be determined by the local school district.

(1) Four **English** credits.

(2) Three **mathematics** credits that satisfy the requirements set forth below:

(a) Unless otherwise provided for in (d) through (g) of this subsection, the three mathematics credits required under this section must include:

(i) Algebra 1 or integrated mathematics I;

(ii) Geometry or integrated mathematics II; and

(iii) Algebra 2 or integrated mathematics III.

(b) A student may elect to pursue a third credit of high school-level mathematics, other than algebra 2 or integrated mathematics III, if all of the following requirements are met:

(i) The student's elective choice is based on a career oriented program of study identified in the student's high school and beyond plan that is currently being pursued by the student;

(ii) The student's parent(s)/guardian(s) (or designee for the student if a parent or guardian is unavailable) agree that the third credit of mathematics elected is a more appropriate course selection than algebra 2 or integrated mathematics III because it will better serve the student's education and career goals;

(iii) A meeting is held with the student, the parent(s)/guardian(s) (or designee for the student if a parent or guardian is unavailable), and a high school representative for the purpose of discussing the student's high school and beyond plan and advising the student of the requirements for credit bearing two- and four-year college level mathematics courses; and

(iv) The school has the parent(s)/guardian(s) (or designee for the student if a parent or guardian is unavailable) sign a form acknowledging that the meeting with a high school representative has occurred, the information as required was discussed, and the parent(s)/guardian(s) (or designee for the student if a parent or guardian is unavailable) agree that the third credit of mathematics elected is a more appropriate course selection given the student's education and career goals.

(c) Courses in (a) and (b) of this subsection may be taken currently in the following combinations:

(i) Algebra 1 or integrated mathematics I may be taken concurrently with geometry or integrated mathematics II.

(ii) Geometry or integrated mathematics II may be taken concurrently with algebra 2 or integrated mathematics III or a third credit of mathematics to the extent authorized in (b) of this subsection.

(d) Equivalent career and technical education (CTE) mathematics courses meeting the requirements set forth in RCW 28A.230.097 can be taken for credit instead of any of the mathematics courses set forth in (a) of this subsection if the CTE mathematics courses are recorded on the student's transcript using the equivalent academic high school department designation and course title.

(e) A student who prior to ninth grade successfully completed algebra 1 or integrated mathematics I; and/or geometry or integrated mathematics II, but does not request high school credit for such course(s) as provided in RCW 28A.230.090, may either:

(i) Repeat the course(s) for credit in high school; or

(ii) Complete three credits of mathematics as follows:

(A) A student who has successfully completed algebra 1 or integrated mathematics I shall:

- Earn the first high school credit in geometry or integrated mathematics II;

- Earn the second high school credit in algebra 2 or integrated mathematics III; and

- Earn the third high school credit in a math course that is consistent with the student's education and career goals.

(B) A student who has successfully completed algebra 1 or integrated mathematics I, and geometry or integrated mathematics II, shall:

- Earn the first high school credit in algebra 2 or integrated mathematics III; and

- Earn the second and third credits in mathematics courses that are consistent with the educational and career goals of the student.

(f) A student who satisfactorily demonstrates competency in algebra 1 or integrated mathematics I pursuant to a written district policy, but does not receive credit under the provisions of WAC 180-51-050, shall complete three credits of high school mathematics in the following sequence:

- Earn the first high school credit in geometry or integrated mathematics II;

- Earn the second high school credit in algebra 2 or integrated mathematics III; and

- Earn the third credit in a mathematics course that is consistent with the student's education and career goals.

(g) A student who satisfactorily demonstrates competency in algebra 1 or integrated mathematics I and geometry or integrated mathematics II pursuant to a written district policy, but does not receive credit for the courses under the provisions of WAC 180-51-050, shall complete three credits of high school mathematics in the following sequence:

- Earn the first high school credit in algebra 2 or integrated mathematics III;

- Earn the second and third high school credits in courses that are consistent with the educational and career goals of the student.

(3) Two **science** credits, at least one of the two credits must be in laboratory science.

(4) Three **social studies** credits (2.5 credits prescribed courses, plus a .5 credit social studies elective) and a noncredit requirement. The social studies requirement shall consist of the following mandatory courses or equivalencies:

(a) One credit shall be required in United States history.

(b) Successful completion of Washington state history and government shall be required, subject to the provisions of RCW 28A.230.170; RCW 28A.230.090 and WAC 392-410-120, and shall consider including information on the culture, history, and government of the American Indian peoples who were the first inhabitants of the state. Successful completion must be noted on each student's transcript. The Washington state history and government requirement may be waived by the principal for students who: (i) Have successfully completed a state history and government course of study in another state; or (ii) are in eleventh or twelfth grade and who have not completed a course of study in Washington's history and state government because of previous residence outside the state.

(c) One credit shall be required in contemporary world history, geography, and problems. Courses in economics, sociology, civics, political science, international relations, or related courses with emphasis on contemporary world problems may be accepted as equivalencies.

(d) One-half credit shall be required in civics and include at a minimum the content listed in RCW 28A.230.093.

(5) Two **health and fitness** credits (.5 credit health; 1.5 credits fitness). Students may be excused from the fitness requirement under RCW 28A.230.050. Such excused students shall be required to demonstrate proficiency/competency in the knowledge portion of the fitness requirement, in accordance with written district policy.

(6) One **arts** credit. The essential content in this subject area may be satisfied in the visual or performing arts.

(7) One credit in **occupational education**. "Occupational education" means credits resulting from a series of learning experiences designed to assist the student to acquire and demonstrate competency of skills under student learning goal four and which skills are required for success in current and emerging occupations. At a minimum, these competencies shall align with the definition of an exploratory course as contained in the career and technical education (CTE) program standards of the office of the superintendent of public instruction.

(a) Students who earn a graduation requirement credit through a CTE course locally determined to be equivalent to a non-CTE course will not be required to earn a second credit in the non-CTE course subject; the single CTE course meets two graduation requirements.

(b) Students who earn a graduation requirement credit in a non-CTE course locally determined to be equivalent to a CTE course will not be required to earn a second credit in the CTE course subject; the single non-CTE course meets two graduation requirements.

(c) Students satisfying the requirement in (a) or (b) of this subsection will need to earn five elective credits instead of four; total credits required for graduation will not change.

(8) Four credits of electives.

(9) (~~Each student shall complete a culminating project for graduation. The project shall consist of the student demonstrating both their learning competencies and preparations related to learning goals three and four. Each district shall define the process to implement~~

~~this graduation requirement, including assessment criteria, in written district policy.~~

~~(10))~~ Each student shall have a high school and beyond plan for their high school experience, including what they expect to do the year following graduation.

~~((11))~~ (10) Students who complete and pass all required International Baccalaureate Diploma Programme courses are considered to have satisfied state subject and credit requirements for graduation from a public high school, subject to the provisions of RCW 28A.230.090, 28A.230.170, and chapter 28A.230 RCW.

~~((12))~~ (11) A school district may obtain a two-year extension from the effective date for the implementation of the four credits of English and/or the three credits of social studies required under this section upon the filing of a written resolution by the district's school board with the state board of education stating the district's intent to delay implementation of the increased English and/or social studies requirements effective for the class of 2016. The resolution must be filed by June 1, 2012. A district filing a timely resolution with the state board of education shall maintain the English, social studies, and elective credits in effect under WAC 180-51-066 for the period of the extension.



NEW SECTION

**WAC 180-51-068 State subject and credit requirements for high school graduation—Students entering the ninth grade on or after July 1, 2015.** The statewide subject areas and credits required for high school graduation, beginning July 1, 2015, for students who enter the ninth grade or begin the equivalent of a four-year high school program, shall total twenty-four as provided in this section, except as otherwise provided in subsections (11) and (12) of this section. All credits are to be aligned with the state's essential academic learning requirements developed under RCW 28A.655.070 for the subject. The content of any course shall be determined by the local school district.

(1) Four **English** credits.

(2) Three **mathematics** credits that satisfy the requirements set forth in (a) through (e) of this subsection:

(a) Unless otherwise provided for in (b) of this subsection, the three mathematics credits required under this section must include:

(i) Algebra 1 or integrated mathematics I;

(ii) Geometry or integrated mathematics II; and

(iii) A third credit of high school mathematics, aligning with the student's interests and high school and beyond plan as provided in (10) of this section, and preparing the student to meet state standards for graduation under the assessment system in RCW 28A.655.061, with agreement of the student's parent or guardian, or, if the parent or guardian is unavailable or does not respond to a request from the school for approval of a specific course, agreement of the school counselor or principal;

(b) Equivalent career and technical education (CTE) mathematics courses meeting the requirements set forth in RCW 28A.230.097 can be taken for credit instead of any of the mathematics courses set forth in (a) of this subsection, if the CTE mathematics courses are recorded on the student's transcript using the equivalent academic high school department designation and course title.

(c) A student who prior to ninth grade successfully completed algebra 1 or integrated mathematics I; and/or geometry or integrated mathematics II, but does not request high school credit for such course(s) as provided in RCW 28A.230.090, may either:

(i) Repeat the course(s) for credit in high school; or

(ii) Complete three credits of mathematics as follows:

(A) A student who has successfully completed algebra 1 or integrated mathematics I shall:

(I) Earn the first high school credit in geometry or integrated mathematics II;

(II) Earn the second and third high school credits in courses aligning with the student's interests and high school and beyond plan and preparing the student to meet state standards for graduation under the assessment system in RCW 28A.655.061; and

(B) A student who has successfully completed algebra 1 or integrated mathematics I, and geometry or integrated mathematics II, shall: Earn the first, second and third high school credits in courses aligning with the student's interests and high school and beyond plan and preparing the student to meet state standards for graduation under the assessment system in RCW 28A.655.061.

(d) A student who satisfactorily demonstrates competency in algebra 1 or integrated mathematics I pursuant to a written district poli-

cy, but does not receive credit under the provisions of WAC 180-51-050, shall complete three credits of high school mathematics in the following sequence:

(i) Earn the first high school credit in geometry or integrated mathematics II;

(ii) Earn the second and third high school credits in courses aligning with the student's interests and high school and beyond plan and preparing the student to meet state standards for graduation under the assessment system in RCW 28A.655.061.

(e) A student who satisfactorily demonstrates competency in algebra I or integrated mathematics I and geometry or integrated mathematics II pursuant to a written district policy, but does not receive credit for the courses under the provisions of WAC 180-51-050, shall complete three credits of high school mathematics in the following sequence: Earn the first, second and third credits in courses aligning with the student's interests and high school and beyond plan and preparing the student to meet state standards for graduation under the assessment system in RCW 28A.655.061.

(3) Three **science** credits, at least two of which must be in laboratory science as provided in subsection (14)(a) of this section. A student may choose the content of the third credit of science, based on the student's interests and high school and beyond plan, with agreement of the student's parent or guardian, or, if the parent or guardian is unavailable or does not respond to a request from the school for approval of a specific course, agreement of the school counselor or principal.

(4) Three **social studies** credits (2.5 credits prescribed courses, plus a .5 credit social studies elective) and a noncredit requirement. The social studies requirement shall consist of the following mandatory courses or equivalencies:

(a) One credit shall be required in United States history.

(b) Successful completion of Washington state history and government shall be required, subject to the provisions of RCW 28A.230.170, 28A.230.090 and WAC 392-410-120, and shall consider including information on the culture, history, and government of the American Indian peoples who were the first inhabitants of the state. Successful completion must be noted on each student's transcript. The Washington state history and government requirement may be waived by the principal for students who:

(i) Have successfully completed a state history and government course of study in another state; or

(ii) Are in eleventh or twelfth grade and who have not completed a course of study in Washington's history and state government because of previous residence outside the state.

(c) One credit shall be required in contemporary world history, geography, and problems. Courses in economics, sociology, civics, political science, international relations, or related courses with emphasis on contemporary world problems may be accepted as equivalencies.

(d) One-half credit shall be required in civics and include at a minimum the content listed in RCW 28A.230.093.

(5) Two **health and fitness** credits (.5 credit health; 1.5 credits fitness). Students may be excused from the fitness requirement under RCW 28A.230.050. Such excused students shall be required to demonstrate proficiency/competency in the knowledge portion of the fitness requirement, in accordance with written district policy.

(6) Two **arts** credits. The essential content in this subject area may be satisfied in the visual or performing arts. One of the two arts credits may be replaced with a personalized pathways requirement as provided in subsection (14)(c) of this section.

(7) One credit in **career and technical education**. A career and technical education (CTE) credit means a credit resulting from a course in a CTE program or occupational education credit as contained in the CTE program standards of the office of the superintendent of public instruction. "Occupational education" means credits resulting from a series of learning experiences designed to assist the student to acquire and demonstrate competency of skills under student learning goal four and which skills are required for success in current and emerging occupations. At a minimum, these competencies shall align with the definition of an exploratory course as contained in the CTE program standards of the office of the superintendent of public instruction. An exception may be made for private schools as provided in WAC 180-90-160.

(a) Students who earn a graduation requirement credit through a CTE course locally determined to be equivalent to a non-CTE course will not be required to earn a second credit in the non-CTE course subject; the single CTE course meets two graduation requirements.

(b) Students who earn a graduation requirement credit in a non-CTE course locally determined to be equivalent to a CTE course will not be required to earn a second credit in the CTE course subject; the single non-CTE course meets two graduation requirements.

(c) Students satisfying the requirement in (a) or (b) of this subsection will need to earn five elective credits instead of four; total credits required for graduation will not change.

(8) Two credits in **world languages or personalized pathway requirements**. If the student has chosen a four-year degree pathway under subsection (10) of this section, the student shall be advised to earn two credits in world languages.

(9) Four credits of electives.

(10) Each student shall have a high school and beyond plan to guide his or her high school experience, including plans for post-secondary education or training and career. The process for completing the high school and beyond plan is locally determined and designed to help students select course work and other activities that will best prepare them for their post-secondary educational and career goals. Students shall create their high school and beyond plans in cooperation with parents/guardians and school staff. School staff shall work with students to update the plans during the years in which the plan is implemented in order to accommodate changing interests or goals. High school and beyond plans must include, but are not limited to:

(a) Identification of career goals, including personal interests and abilities in relation to career goals;

(b) Identification of educational goals through research on post-secondary training and education related to the student's career goals, including information on benefits and costs;

(c) A four-year plan for course-taking, created in middle school grades, that will ensure fulfillment of graduation requirements and align with the student's interests and educational and career goals, including identification of a personalized pathway and personalized pathway requirements, as provided in subsection (14) of this section, and consideration of dual credit opportunities;

(d) Identification of assessments required to graduate from high school, pursue post-secondary opportunities, and achieve the career or educational goals chosen in the student's high school and beyond plan.

(11) A school district wishing to implement the requirements for high school graduation specified in this section for students who enter the ninth grade or begin the equivalent of a four-year high school program on July 1, 2016, or July 1, 2017, rather than July 1, 2015, may apply to the state board of education for a temporary waiver of the requirements of this section. The state board of education shall post an application form on its web site for use by districts seeking this waiver.

(a) An application for a waiver under this subsection must:

(i) Meet the requirements of chapter 217, Laws of 2014 (E2SSB 6552), which include describing why the waiver is being requested, the specific impediments preventing timely implementation of the high school graduation requirements established in subsections (1) through (9) of this section, and the efforts that will be taken to achieve implementation with the graduating class proposed under the waiver.

(ii) Be accompanied by a resolution adopted by the district board of directors requesting the waiver under this section. The resolution must state the entering freshman class or classes for whom the waiver is requested, and be signed by the board chair or president and the district superintendent.

(b) A district implementing a waiver under this subsection shall continue to be subject to the requirements of WAC 180-51-067 during the school year or years for which the waiver has been granted.

(c) Nothing in this section shall prevent a district granted a waiver under this subsection from electing to implement WAC 180-51-068 during the term for which the waiver is granted. A district granted a waiver that elects to implement WAC 180-51-068 shall provide notification of such decision to the state board of education.

(d) The state board of education shall post the application for each waiver granted on its public web site.

(12) A school district that grants high school diplomas may waive up to two of the credits required for graduation under this section for individual students for reason of unusual circumstances, as defined by the district. Students granted a waiver under this subsection must earn the seventeen required subject credits in subsections (1) through (7) of this section, including by satisfactory demonstration of competence under WAC 180-51-050. The waiving of credits for individual students for reason of unusual circumstances must be in accordance with written policies adopted by resolution of each board of directors of a district that grants diplomas.

(13) Students who complete and pass all required International Baccalaureate Diploma Programme courses are considered to have satisfied state subject and credit requirements for graduation from a public high school, subject to the provisions of RCW 28A.230.090, 28A.230.170, and chapter 28A.230 RCW.

(14) Definitions:

(a) "Laboratory science" means any instruction that provides opportunities for students to interact directly with the material world, or with data drawn from the material world, using the tools, data collection techniques, models and theories of science. A laboratory science course meeting the requirement of this section may include courses conducted in classroom facilities specially designed for laboratory science, or coursework in traditional classrooms, outdoor spaces,

or other settings which accommodate elements of laboratory science as identified in this subsection;

(b) "Personalized pathway" means a locally determined body of coursework identified in a student's high school and beyond plan that is deemed necessary to attain the post-secondary career or educational goals chosen by the student;

(c) "Personalized pathway requirements" means up to three course credits chosen by a student under subsections (6) and (8) of this section that are included in a student's personalized pathway and prepare the student to meet specific post-secondary career or educational goals.

NEW SECTION

**WAC 180-18-100 District waiver from requirement for student access to career and technical education course equivalencies.** (1) Any school district reporting, in any school year, an October P223 headcount of fewer than two thousand students as of January of that school year may apply to the state board of education for a waiver of up to two years from the provisions of RCW 28A.230.010(2) for the subsequent school year.

(2) In any application for a waiver under this section, the district shall demonstrate that students enrolled in the district do not have and cannot be provided reasonable access, through high schools, interdistrict cooperatives, skill centers or branch or satellite skill centers, or through online learning or applicable running start vocational courses, to at least one career and technical education course that is considered equivalent to a mathematics course or at least one career and technical education course that is considered equivalent to a science course as determined by the superintendent of public instruction and the state board of education under RCW 28A.700.070.

(3) On a determination, in consultation with the office of the superintendent of public instruction, that the students enrolled in the district do not and cannot be provided reasonable access to at least one career and technical education course that is considered equivalent to a mathematics course or at least one career and technical education course that is considered equivalent to a science course under subsection (2) of this section, the state board of education shall grant the waiver for the term of years requested.

(4) The state board of education shall post on its web site an application form for use by a district in applying for a waiver under this section. A completed application must be signed by the chair or president of the district's board of directors and superintendent.

(5) In order to provide sufficient notice to students, parents, and staff, the application must be submitted to the state board of education in electronic form no later than January 15th of the school year prior to the school year for which the waiver is requested, and no later than thirty days before the board meeting at which the application will be considered. The board shall post all applications received on its public web site.

**WAC 180-90-160 Minimum standards and certificate form.** The annual certificate required by WAC 180-90-130 shall be in substantial compliance with the form and substance of the following:

CERTIFICATE OF COMPLIANCE  
WITH STATE STANDARDS

ESD/County/Public  
School District  
Private School/  
District Address

I, . . . . ., do hereby certify that I am the principal or chief administrator of the above named school; that said school is located at the address listed above, and conducts grades . . . . . through . . . . . with a projected enrollment of . . . . .; and that said school is scheduled to meet throughout the . . . . . school year, the following standards with the exception only of such deviations, if any, as are set forth in an attachment to this certificate of compliance

or

I, . . . . ., do hereby certify that I am the superintendent of the above named private school district; and that the private schools under my jurisdiction are scheduled to meet throughout the school year, the following standards with the exception only of such deviations as are set forth in an attachment to this certificate of compliance; and that a list of such schools, including the grades conducted and the projected enrollment for each school, accompanies this certificate:

Following initial approval as a private school by the state board of education, evidence of current accreditation by a state board of education approved accrediting body may be submitted annually in lieu of approval documents described in 1-12.

(1) The minimum school year for instructional purposes consists of no less than 180 school days or the equivalent in annual minimum instructional hour offerings as prescribed in RCW 28A.150.220.

(2) On each school day, pupils enrolled in the school are provided the opportunity to be engaged in educational activity planned by and under the direction of the staff, as directed by the administration and/or governing board; and that pupils are provided a total instructional hour offering as prescribed in RCW 28A.150.220 except that the percentages for basic skills, work skills, and optional subjects and activities prescribed in RCW 28A.150.220 do not apply to private schools and that the total instructional hour offering, except as otherwise specifically provided in RCW 28A.150.220, made available is at least:

(a) 450 hours for students in kindergarten.

(b) 1000 hours for students in grades one through twelve.

(3) All classroom teachers hold appropriate Washington State certification except for:

(a) Teachers for religious courses or courses for which no counterpart exists in the public schools: Provided, That a religious course is a course of study separate from the courses of study defined in RCW 28A.195.010 including occupational education, science, mathe-

matics, language, social studies, history, health, reading, writing, spelling, and the development of the appreciation of art and music all in sufficient units for meeting state board of education graduation requirements; and/or

(b) A person of unusual competence who is not certified but who will teach students in an exceptional case under the general supervision of a Washington state certificated teacher or administrator pursuant to WAC 180-90-112. The non-Washington state certificated teacher, the Washington state certificated person who will supervise, and the exceptional circumstances are listed on the addendum to this certificate: Provided, That if a non-Washington state certificated teacher is employed subsequent to the filing of this certificate, this same information shall be forwarded to the superintendent of public instruction within thirty days from the date of employment.

(4) If the school operates an extension program for parents, guardians, or persons having legal custody of a child to teach children in their custody, the extension program meets the following requirements:

(a) The parent, guardian, or custodian is supervised by a person certified under chapter 28A.410 RCW and who is employed by the school;

(b) The planning by the certified person and the parent, guardian, or person having legal custody includes objectives consistent with this subsection and subsections (1), (2), (5), (6), and (7) of this section;

(c) The certified person spends a minimum average each month of one contact hour per week with each student under his or her supervision who is enrolled in the extension program;

(d) Each student's progress is evaluated by the certified person; and

(e) The certified person does not supervise more than thirty students enrolled in the approved private school's extension program.

(5) Measures have been taken to safeguard all permanent records against loss or damage through either the storage of such records in fire-resistant containers or facilities, or the retention of duplicates in a separate and distinct area;

(6) The physical facilities of the school are adequate to meet the program offered, and all school facilities and practices are in substantial compliance with reasonable health and fire safety standards, as substantiated by current inspection reports of appropriate health and fire safety officials which are on file in the chief administrator's office;

(7) The school's curriculum includes instruction in the basic skills of occupational education, science, mathematics, language, social studies, history, health, reading, writing, spelling, and the development of appreciation of art and music in sufficient units for meeting state board of education graduation requirements, as set forth in chapter 180-51 WAC. A school may substitute courses specific to the mission or focus of the school to satisfy the requirement of WAC 180-51-068(7);

(8) The school or its organized district maintains up-to-date policy statements related to the administration and operation of the school or district;

(9) The school does not engage in a policy of racial segregation or discrimination;

(10) The governing authority of this private school or private school district has been apprised of the requirements of chapter 180-90 WAC relating to the minimum requirements for approval of pri-



vate schools and such governing authority has further been apprised of all deviations from the rules and regulations of the state board of education and the standards contained in chapter 180-90 WAC. I have reported all such deviations herewith.

(11) Approval by the state board of education is contingent upon on-going compliance with the standards certified herein. The superintendent of public instruction shall be notified of any deviation from these standards which occurs after the action taken by the state board of education. Such notification shall be filed within thirty days of occurrence of the deviation.

(12) Failure to comply with the requirements of this chapter may result in the revocation of the approval of the private school and shall be considered in subsequent application for approval as a private school.

**Dated** this .... day of ....., ((19)) 20...

.....

(signed)

.....

(title)

.....

(phone number)



# PROPOSED RULE MAKING

## CR-102 (June 2012)

(Implements RCW 34.05.320)

Do NOT use for expedited rule making

Agency: State Board of Education

<input checked="" type="checkbox"/> Preproposal Statement of Inquiry was filed as WSR 14-07-109 ; or	<input checked="" type="checkbox"/> Original Notice
<input type="checkbox"/> Expedited Rule Making--Proposed notice was filed as WSR _____; or	<input type="checkbox"/> Supplemental Notice to WSR _____
<input type="checkbox"/> Proposal is exempt under RCW 34.05.310(4) or 34.05.330(1).	<input type="checkbox"/> Continuance of WSR _____

**Title of rule and other identifying information:** (Describe Subject)

Amended WAC 180-16-200. Total instructional hour requirement.

Amended WAC 180-51-066. Minimum requirements for high school graduation. Students entering ninth grade on or after July 1, 2009 through June 30, 2012.

Amended WAC 180-51-067. Minimum requirements for high school graduation. Students entering ninth grade on or after July 1, 2012.

New WAC 180-51-068. State subject and credit requirements for high school graduation. Students entering the ninth grade on or after July 1, 2015.

New WAC 180-18-100. District waiver from requirement on access to CTE course equivalencies.

Amended WAC 180-90-160. [Private schools.] Minimum standards and certificate form.

<b>Hearing location(s):</b> Educational Service District 101 4202 S. Regal Spokane, WA  Date: <u>July 9, 2014</u> Time: <u>1:00 P.M.</u>	<b>Submit written comments to:</b> Name: Jack Archer Address: Old Capitol Building Room 253 600 Washington St. SE P.O. Box 47206 Olympia, WA 98504 e-mail <u>sbe@sbe.wa.gov</u> fax (360) <u>586-2357</u> by (date) July 3, 2014
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<b>Date of intended adoption:</b> <u>July 10, 2014</u> (Note: This is NOT the effective date)	<b>Assistance for persons with disabilities:</b> Contact <u>Tami Jensen</u> by <u>July 3, 2014</u>  TTY (360) <u>664-3631</u> or (360) <u>725-6025</u>
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**Purpose of the proposal and its anticipated effects, including any changes in existing rules:** The purpose of the proposed rules is to implement Chapter 217, Laws of 2014 (E2SSB 6552). This legislation requires the SBE to adopt rules to implement the high school graduation requirements adopted under board resolution in November 2010 and January 2014, to take effect, with certain specified modifications, with the graduating class of 2019. The SBE must also amend a current rule to implement provisions of C 217 L 14 concerning instructional hour offerings for the minimum program of basic education, and a new rule to implement provisions of the act concerning career and technical education (CTE) course equivalencies.

**Reasons supporting proposal:** The proposal is necessary to implement 2104 legislation. The SBE is directed by Section 202(1)(d)(i) of E2SSB 6552, 2014 Session, to adopt rules to implement the high school graduation requirements adopted by resolution of the Board in November 2010 and January 2014, with certain modifications. Section 202(1) (c) prohibits the SBE from requiring students to complete a culminating project for high school graduation, effective with the graduating class of 2015. To meet these requirements the SBE must both amend prior and existing WACs on high school graduation requirements and adopt a new WAC to implement the new graduation requirements. The SBE has also identified the need for rule-making on the provisions of Sec. 202 for district waivers from the new graduation requirements for up to two years, on waivers by districts of up to two credits for individual students on grounds of individual circumstances, on the provision of Section 201 changing the instructional hour requirements for basic education in RCW 28A.150.220, and on the provision of Sections 103(3) and 104 authorizing certain districts to apply for a waiver from the SBE of the provision of Section 103 requiring districts to offer at least one career and technical education (CTE) course that is considered equivalent to a mathematics or science course by OSPI.

<b>Statutory authority for adoption:</b> RCW 28A.305.130. RCW 28A.230.090.	<b>Statute being implemented:</b> RCW 28A.230.090 and 2011 c 203 s2 as amended by Chapter 217, Laws of 2014.
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**Is rule necessary because of a:**

Federal Law?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Federal Court Decision?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
State Court Decision?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

If yes, CITATION:

**DATE**  
June 4, 2014

**NAME** (type or print)  
Ben Rarick

**SIGNATURE**

**TITLE**  
Executive Director

**CODE REVISER USE ONLY**

**OFFICE OF THE CODE REVISER**  
**STATE OF WASHINGTON**  
**FILED**

**DATE: June 04, 2014**  
**TIME: 11:20 AM**

**WSR 14-12-098**

Agency comments or recommendations, if any, as to statutory language, implementation, enforcement, and fiscal matters:

Name of proponent: (person or organization) State Board of Education

- Private
- Public
- Governmental

Name of agency personnel responsible for:

Name	Office Location	Phone
Drafting..... Jack Archer	Old Capitol Building, 600 Washington St. SE Olympia, WA	( )
Implementation.... Ben Rarick	Old Capitol Building, 600 Washington St. SE Olympia, WA	( )
Enforcement..... Ben Rarick	Old Capitol Building, 600 Washington St. SE Olympia, WA	( )

Has a small business economic impact statement been prepared under chapter 19.85 RCW or has a school district fiscal impact statement been prepared under section 1, chapter 210, Laws of 2012?

Yes. Attach copy of small business economic impact statement or school district fiscal impact statement.

A copy of the statement may be obtained by contacting:

Name: Thomas J. Kelly

Address: Old Capitol Building, 600 Washington St. SE Olympia, WA 98504

phone (360) 725-6031 \_\_\_\_\_

fax ( ) \_\_\_\_\_

e-mail [thomas.kelly@k12.wa.us](mailto:thomas.kelly@k12.wa.us)

No. Explain why no statement was prepared.

Is a cost-benefit analysis required under RCW 34.05.328?

Yes A preliminary cost-benefit analysis may be obtained by contacting:

Name:

Address:

phone ( ) \_\_\_\_\_

fax ( ) \_\_\_\_\_

e-mail \_\_\_\_\_

No: Please explain:



# STATE BOARD OF EDUCATION RULE CHANGE SCHOOL DISTRICT FISCAL IMPACT STATEMENT

<b>WSR:</b>	<b>Title of Rule:</b> SB 6552- Improving student success by increasing instructional hour and graduation requirements.	<b>Agency:</b> SDF - School District Fiscal Impact - SPI
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**Part I: Estimates**

**No Fiscal Impact**

To satisfy the intent of Additional analysis will be needed of the impacts of the HSBP section (Sec. 10) of proposed WAC 180-51-068. We need to survey a larger sample of districts in order to satisfy requirements of RCW 28A.305.135.

**Estimated Cash Receipts to:**

No Estimated Cash Receipts

ACCOUNT	FY 2014	FY 2015	2013-15	2015-17	2017-19
<b>Total \$</b>					

**Estimated Expenditures From:**

No Estimated Expenditures

ACCOUNT	FY 2014	FY 2015	2013-15	2015-17	2017-19
Indeterminate at this time.					
<b>Total \$</b>					

**Estimated Capital Impact:**

No Estimated Capital Impact

ACCOUNT	FY 2014	FY 2015	2013-15	2015-17	2017-19
<b>Total \$</b>					

*The cash receipts and expenditures estimate on this page represent the most likely fiscal impact.*

**Check applicable boxes and follow corresponding instructions:**

If fiscal impact is greater than \$50,000 per fiscal year in the current biennium or in subsequent biennia, complete entire fiscal note from Parts I-IV.

If fiscal impact is less than \$50,000 per fiscal year in the current biennium or in subsequent biennia, complete this page only (Part I).

Capital budget impact, complete Part IV.

Agency Preparation: T.J. Kelly	Phone: 360-725-6301	Date: 05/30/2014
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Agency Approval:	Name Here	Phone: 360-725-0000	Date:
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## **Part II: Narrative Explanation**

### **II. A – Brief Description Of What the Measure Does That Has Fiscal Impact**

*Briefly describe by section, the significant provisions of the rule, and any related workload or policy assumptions, that have revenue or expenditure impact on the responding agency.*

Additional analysis will be needed of the impacts of the HSBP section (Sec. 10) of proposed WAC 180-51-068.

### **II. B – Cash Receipts Impact**

*Briefly describe and quantify the cash receipts impact of the rule on the responding agency, identifying the cash receipts provisions by section number and when appropriate the detail of the revenue sources. Briefly describe the factual basis of the assumptions and the method by which the cash receipts impact is derived. Explain how workload assumptions translate into estimates. Distinguish between one time and ongoing functions.*

### **II. C – Expenditures**

*Briefly describe the agency expenditures necessary to implement this rule (or savings resulting from this rule), identifying by section number the provisions of the rule that result in the expenditures (or savings). Briefly describe the factual basis of the assumptions and the method by which the expenditure impact is derived. Explain how workload assumptions translate into cost estimates. Distinguish between one time and ongoing functions.*

## **Part III: Expenditure Detail**

### **III. A – Expenditures by Object or Purpose**

None

## **Part IV: Capital Budget Impact**

None

Public Comments Submitted to [sbe@sbe.wa.gov](mailto:sbe@sbe.wa.gov)  
As of June 25, 2014

Proposed New or Amended WACs Implementing Chapter 217 Laws of 2014 (E2SSB 6552)

**From:** Chapin, Susan S  
**Sent:** Friday, May 16, 2014 4:09 PM  
**To:** SBE  
**Subject:** graduation requirements

Thank you for asking for feedback regarding the proposed rule changes to the state graduation requirements.

1. I wholeheartedly support the elimination of the mandatory "Culminating Project".
2. I would like the SBE to consider elimination of the current requirement of 1.0 Occupational Education (CTE) credit to obtain a diploma. I believe this requirement is in complete conflict with the emphasis on the student's individual "High School and Beyond Plan". I believe the students would best be served by returning this 1.0 credit to "Electives" so that the student and their family/advisor can select more classes that best meet each student's individual plan. Many students will select Occupational Ed classes among their electives, but other students will find that the ability to use this additional credit in World Languages, Science, Math, social studies or the Arts are more aligned with their specific goals and allows them to get higher level classes that they otherwise would not be able to fit into their schedules. Requiring Occupational Ed classes for every student is too restrictive and counter-productive for those students who desire entrance into a 4 year college or university. I believe that the SBE is too heavily influenced by special interest groups/lobbies who advocate for the skilled trades on this issue and should to take a firmer stand in supporting each student's ability to choose their credits towards a path that meets their individual needs.

Susan Chapin [Member, Board of Directors, Spokane School District]

**From:** Roger B Thompson  
**Sent:** Saturday, May 17, 2014 6:43 AM  
**To:** SBE  
**Subject:** RE: Solicitation of Public Comment on Proposed Rules

With all the test being required students have lost education time.  
All testing time should be added to the total education hours this may add a month to the school year ,but DON'T take education time for test.

**From:** Leslie  
**Sent:** Sunday, May 18, 2014 1:33 PM  
**To:** SBE  
**Subject:** Questions regarding the proposed rules

Firstly, thank you for communicating with us about what is going on at the state level. It is nice to be informed. I do have a couple of questions regarding the proposed rules however.

1) I noticed that they are requiring additional hours of instruction. It looks like they will be mandating full day kindergarten across the state and will be increasing high school hours. Will the state pay for the increased hours? Will high school teachers work more hours than middle school teachers and therefore make more money? Will this money come from the state or from the district/levy monies?

2) It looked like the high schools had a "choice" of additional hours the district would require: 1027 or 1080 hours. Is that true or is there a set requirement from the state? Why the discrepancy? Who chose those numbers? Why does the state think that an extra 9 minutes of instruction or an extra 26 minutes of instruction each day (over the course of 180 days) is going to increase student learning? Is it worth the extra money the state will pay teachers? Will it really help students learn concepts better? What is the true objective the legislators are trying to reach? How will they know the extra instructional hours will accomplish that goal?

Please ask these questions on my behalf and on the behalf of the districts who will need to rearrange bus schedules, teachers' salaries, school schedules (which affect parent schedules and child care arrangements, etc.). In my opinion, I think this requirement will cause more headache than it's worth.

Sincerely,

Leslie Robb  
Teacher- Evergreen School District, Vancouver  
School Board Member- Skamania School District- Skamania

**From:** Karen Madsen  
**Sent:** Sunday, May 18, 2014 4:41 PM

Thank you for the opportunity to review and consider the merits of the proposed changes. I appreciate your outreach to the interested public regarding these changes.

I have only one comment, regarding the following passage:

(7) The school's curriculum includes instruction in the basic skills of occupational education, science, mathematics, language, social studies, history, health, reading, writing, spelling, and the development of appreciation of art and music in sufficient units for meeting state board of education graduation requirements, as set forth in chapter 180-51 WAC. A school may substitute



courses specific to the mission or focus of the school to satisfy the requirement of WAC 180-51-068(7);

I think it may be advisable to add the requirement that the school have the approval of the district to which it belongs for such course substitutions. It doesn't seem advantageous to have schools making these decisions without at least the knowledge of the district so that the district can maintain consistent curriculum opportunities for students all across the district.

Thanks again for the opportunity to comment.

Karen Madsen

Public Comments Submitted to [sbe@sbe.wa.gov](mailto:sbe@sbe.wa.gov)  
As of June 25, 2014

Proposed New or Amended WACs Implementing Chapter 217 Laws of 2014 (E2SSB 6552)

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courses specific to the mission or focus of the school to satisfy the requirement of WAC 180-51-068(7);

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Thanks again for the opportunity to comment.

Karen Madsen

-----Original Message-----

From: Dale Shotwell [<mailto:mickeyshotwell@juno.com>]

Sent: Tuesday, June 17, 2014 9:19 AM

To: SBE

Subject: Time to really define basic education ..the career ready diploma is just another stop gap in doing what needs to be done especially for small schools

Dear Mr. Archer,

As a former school admin that testified at the original 75 committee to define and fund basic ed I know that the intent was never accomplished. Again in 2010 the lawsuit was again to define and fund basic ed. Again that was not accomplished. Until the basic education curriculum is defined for all kids in all schools in our state we cannot fully fund that program. Adding in more science, math, computer science etc with out really defining programs for all kids first and then adding those extras you have failed. Where is civics, history, art, music, shop, etc. Many of those programs reinforce math and science and make the curriculum meaningful. Until each teacher can clearly explain to each student how the classes they take will have meaning to them in their lives you have failed. Until students that want to be mechanics, dress designers, artists, etc see the benefit and stop being told they are failures if they dont take more advanced math and science they will continue to drop out....

Dale Shotwell  
Vancouver 98683

-----Original Message-----

From: Barbara Larson

Sent: Sunday, June 22, 2014 12:17 AM

To: SBE

Subject: The College and Career Ready Diploma should be meaningful.

Dear Mr. Archer,

Thank you for your work on the proposed rules for the implementation of the College and Career Ready Diploma (SB 6552).

I believe that the College and Career Ready Diploma should be as strong as possible. Specifically, please:

1. Restrict credits that may be waived to electives.

The College and Career Ready Diploma allows students in "unusual circumstances" to waive up to two credits from the total number of 24. However, students will not be prepared for college or career if they are allowed to waive core credits. The waiver allowance should be restricted to elective credits only.

2. Define "unusual circumstances."

The College and Career Ready Diploma allows school districts to "waive up to two of the credits required... for individual students for reason of unusual circumstances, as defined by the district." Without clarification and more guidance from the State Board of Education, we run the risk of 295 different definitions of "unusual circumstances."

3. Require transparency from school districts.

School districts should report the number of students for whom credits are waived, the number of credits, the credits that were waived, and the demographic information for these students (free and reduced lunch-eligible, special education status, English Language Learner status, and race as a minimum).

Thank you for your work to make the rules for implementation of the College and Career Ready Diploma as strong as possible.

Barbara Larson  
College Place 99324

As of June 25, the State Board of Education also received the above message from the following persons:

Rebekah Fox, Marysville  
Vanassa Wong, Spokane Valley  
Heidi Greidanus, Puyallup  
Jeanie Ostrowsky, Richland  
Barbara Dueñas, Scottsdale AZ  
Jacleen Wong, Kent  
Joyce Sturm, Wenatchee  
Heidi Bennett, Seattle  
Anne Hilton, Seattle

-----Original Message-----

From: Carolyn Simpson

Sent: Tuesday, June 24, 2014 3:43 PM

To: SBE

Subject: Please make the College and Career Ready Diploma as effective as possible.

Dear Mr. Archer,

Thank you for your work on the proposed rules for the implementation of the College and Career Ready Diploma (SB 6552).

There are two areas of work where the College and Career Ready Diploma could be strengthened: parent engagement and the academic rigor of the diploma.

#### PARENT ENGAGEMENT

I believe parents should be involved in their child's middle and high school education every step of the way. Parental involvement is important to student success, and it should be encouraged.

There are four areas where I think the role of parents in the education of their children should be clarified or strengthened:

1. Require parent sign-off on the High School and Beyond Plan.

The language of the proposed rules encourages cooperation between parents/guardians and school staff. While meaningful accommodations should be made for kids in less-than-ideal circumstances (for example, students in foster care), the default should be that parent sign-off is required for a student's High School and Beyond Plan.

2. Require parent sign-off for the 3rd year of math and science.

The proposed rules allow students to choose the third year of math and science without parent sign-off "if the parent or guardian is unavailable or does not respond to a request from the school for approval of a specific course." Without clarification on what "unavailable" or "not responsive" means, each school district can interpret those terms differently.

3. Ensure that parents with limited English proficiency can access the information.

The rules should specify that parents be able to access information in their native language, in both written and verbal form. Efforts should also be made to make sure all parents understand the implications of the High School and Beyond Plan for their children.

4. Specify an appeals process that empowers students to take the most rigorous courses. Some courses, including advanced courses like AP and IB, have a cap on how many students may enroll. Schools should have a clear and transparent process for parents who want to appeal a decision to not allow their student to take a particular course.

#### A MEANINGFUL HIGH SCHOOL DIPLOMA

There are three areas where I think the academic rigor of the College and Career Ready Diploma could be strengthened.

1. Restrict credits that may be waived to electives.

The College and Career Ready Diploma allows students in "unusual circumstances" to waive up to two credits from the total number of 24. However, students will not be prepared for college or career if they are allowed to waive core credits. The waiver allowance should be restricted to elective credits only.

2. Define "unusual circumstances."

The College and Career Ready Diploma allows school districts to "waive up to two of the credits required... for individual students for reason of unusual circumstances, as defined by the district." Without clarification and more guidance from the State Board of Education, we run the risk of 295 different definitions of "unusual circumstances."

3. Require transparency from school districts.

School districts should report the number of students for whom credits are waived, the number of credits, the credits that were waived, and the demographic information for these students (free and reduced lunch-eligible, special education status, English Language Learner status, and race as a minimum).

Thank you for your work to make the rules for implementation of the College and Career Ready Diploma as strong as possible.

Carolyn Simpson  
Snoqualmie 98065

As of June 25, the State Board of Education also received the above message from the following persons:

Barbara Elaine Woo, Bellevue  
Karen Lee, Port Orchard  
Kay Slonim, Seattle  
Linda Hendrickson, Kirkland  
Betsy Cohen, Bellevue  
Janine Weber, Renton  
Bob and Kathy Roseth, Seattle  
Jerrold Liebermann, Seattle

-----Original Message-----

From: Janine Weber

Sent: Thursday, May 29, 2014 5:05 PM

To: SBE

Subject: Please don't undercut parent engagement on the High School and Beyond Plan

Dear Mr. Archer,

Thank you for your work on the proposed rules for the implementation of the College and Career Ready Diploma (SB 6552).

I believe parents should be involved in their child's middle and high school education every step of the way. Parental involvement is important to student success, and it should be encouraged.

There are four areas where I think the role of parents in the education of their children should be clarified or strengthened:

1. Require parent sign-off on the High School and Beyond Plan.

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have a clear and transparent process for parents who want to appeal a decision to not allow their student to take a particular course.

Thank you for your work to make the rules for implementation as strong as possible.

Janine Weber  
Renton 98058

As of June 25, the State Board of Education also received the above message from the following persons:

Dee Hirsch, Seattle  
Rosa Venancio, Lacey  
Saadia Hamid, Kent  
Korista Barney, Renton  
Mel Morgan, Issaquah  
Janine Grondahl, Lakewood  
Stacey Beccari, Spanaway  
Katie Behrends, Seattle  
Sarah Baird, Bainbridge Island  
Dee Hirsch, Seattle  
Victoria Porter, Yakima  
Shirlene Childers, Silverdale  
Cammie Carl, Des Moines  
Ray Lee  
Brooke Valentine  
Charmaine Boston  
Carlina Brown-Banks  
Sylvester Cann  
Sili Savisa  
Miryam Laytner  
Mychal Bolger  
Aubrey Shinosister  
Deneen C. Hill  
Barbara Phillips  
Anna Davis  
Sheri Stephens  
Deborah O'Neal  
Kimberly Dunn  
Paula Steinke  
Jimmie A. James  
Betty Fields-Brown  
Monica McCowan  
Mayet Dalila  
Kimberly Mustafa  
Diane Whitman

-----Original Message-----

From: Ramona Hattendorf

Sent: Friday, June 13, 2014 1:08 PM

To: SBE

Subject: Please, don't assume parents are involved in High School and Beyond Plan

Dear Mr. Archer,

Thank you so much for your work on the proposed rules for the implementation of the College and Career Ready Diploma (SB 6552). This diploma has been a huge undertaking for the State Board of Education, and I truly appreciate your steadfast commitment.

I am, concerned, though, with implementation of this law as it pertains to family engagement. It could make it more difficult for families to support their children as they transition into career and college, and especially for families who face language, culture or disability barriers.

I am speaking for myself, but my views are formed from years of work with families and schools. I served as president of the Seattle Council PTSA, representing 14,000 members and 70-plus nonprofits concerned with family-school partnerships; I served on the parent advisory committee for the state education ombudsman; I represented 140,000 members statewide as government relations staff for the state PTA. Currently, I work with a small nonprofit that supports and facilitates family engagement practices in Seattle and I represent the governor on the Career Education Opportunities Task Force. Here is what I've learned at every step:

- Family engagement is not a given;
- Schools are sometimes quick to decide matters for kids and families
- Schools often do not communicate effectively
- Students still face barriers to placement in certain classes (middle school math is a big one; diverting spec ed kids is another) and this directly affects choices available in their high school and beyond plan, and later the costs they incur in college and trade programs.
- Many students and families do not have access to career counseling through the schools
- Families are not aware of how strong or weak some of the high school offerings are. This is especially the case with career education. Some is excellent and can save students thousands in post-secondary costs. Some has shown poor results, leaving kids without the content for college or the skills for work.

And, sadly, sometimes parents are viewed in a negative light. Even well-intentioned staff often lack the training and resources to reach out effectively, especially to communities where the home-school divide is multi-generational. Some schools, whether they intend to or not, essentially cut families out of the picture when it comes to middle school and beyond. But what's easier for them can have a long-term consequences for kids.

Many parents may never see or even hear about the High School and Beyond Plan. They may never see their child's class selection, never have the opportunity to flag or discuss a particular option that could result in higher costs for college or career training later on. They may never have the opportunity to learn about the choices youth have, or the multiple paths to success. Many families would be thrilled to learn about options that don't include 4-year degrees.

At the last Career Education Opportunities task force hearing, every student who testified had only vague comments about the High School and Beyond Plan. Some referred to it as a piece of paper they filled out in 10th or 11th grade, somewhat after the fact. Even the task force co-chair admitted the plan was more of a "process" than a formal or focused undertaking.

Increasingly, education is taking a P-20 approach, and our family engagement practices likewise need to embrace P-20. High schools have these kids for a few years, and counselor caseloads (if there is a counselor) are in the hundreds. Families are in for the long haul.

So ... in regards to the rules process for 6552, there are four areas where I think the role of parents in the education of their children should be clarified or strengthened:

1. Require parent sign-off on the High School and Beyond Plan.

The language of the proposed rules encourages cooperation between parents/guardians and school staff. While meaningful accommodations should be made for kids in less-than-ideal circumstances (for example, students in foster care), the default should be that parent sign-off is required for a student's High School and Beyond Plan.

2. Require parent sign-off for the 3rd year of math and science.

The proposed rules allow students to choose the third year of math and science without parent sign-off "if the parent or guardian is unavailable or does not respond to a request from the school for approval of a specific course." Without clarification on what "unavailable" or "not responsive" means, each school district can interpret those terms differently.

3. Ensure that parents with limited English proficiency can access the information.

The rules should specify that parents be able to access information in their native language, in both written and verbal form. Efforts should also be made to make sure all parents understand the implications of the High School and Beyond Plan for their children.

4. Specify an appeals process that empowers students to take the most rigorous courses.

Some courses, including advanced courses like AP and IB, have a cap on how many students may enroll. Schools should have a clear and transparent process for parents who want to appeal a decision to not allow their student to take a particular course.

Thank you for your work to make the rules for implementation as strong as possible.

Ramona Hattendorf  
Seattle 98199

-----Original Message-----

**From:** Herren, Kip [<mailto:kherren@auburn.wednet.edu>]

**Sent:** Friday, June 06, 2014 4:21 PM

**To:** SBE

**Cc:** [kherren@auburn.wednet.edu](mailto:kherren@auburn.wednet.edu); Johns, Ruth

**Subject:** Graduation requirement comment

Hello State Board,

After reviewing the new graduation requirements, I have one concern that seems to me does not align with well with my perception of legislative intent. It is in regard to the hardship option of 22 credits if 24 credits were attempted. The current rules now seem to add an additional hurdle in that the core 17 credits cannot be a part of the reduction in 24 credits requirement. As we already require assessment performances to graduate in many of those core areas it seems that the board has overstepped the regulation by requiring more seat time which adds additional costs and is the nemesis of students who are experiencing hardship. I do not recall this being the intent of the legislature to require such a limited waiver of 24 credits. Please reconsider that portion of graduation credits. My school board, administrative team, and superintendent colleagues have expressed the same concern. If I have misread the regulation or misunderstood legislative intent please enlighten me.

Thanks,

Kip Herren

ASD Superintendent



June 16, 2014

Dear Washington State Board of Education members and staff,

On behalf of the undersigned organizations and our constituencies, please accept this letter as jointly endorsed comments in response to the proposed rules to implement E2SSB 6552.

The Excellent Schools Now (ESN) Coalition applauds the work of the State Board members and staff in advocating for, supporting, and now implementing updated high school graduation requirements. We also believe that improvements should be made to the rules. Our comments center around two main topics: parent engagement and academic rigor.

### **1) Parent engagement**

While we appreciate the State Board's effort to support parent engagement in the proposed rules, we feel strongly that the rules can and should do more.

#### **a. Require parent signoff on the third year of math and science.**

The current graduation requirements require a meeting with the student, parent/guardian, and a high school representative; and a signed form acknowledging the meeting if the student pursued a third credit other than Algebra II or Integrated Mathematics III. (WAC 180-51-067)

The proposed rules currently require a third credit of math or science "...with agreement of the student's parent or guardian, or, if the parent or guardian is unavailable or does not respond to a request from the school for approval of a specific course, agreement of the school counselor or principal."

We believe that the language is unclear as to whose burden of proof it is that the parent or guardian is unavailable or did not respond. The school should affirmatively show that they have made attempts to engage the parents. There should be accommodations made for students who are in exceptional circumstances, but exceptional circumstances should not dictate the default for all students and their families. The requirements for parent engagement and signoff should be, at the least, at the same level as the prior graduation requirements, not at a lower level.

#### **b. Require parent signoff at least once every school year on the High School and Beyond Plan.**

The High School and Beyond Plan (HSBP) is meant to guide a student's high school experience and prepare the student for the next step in his or her career, be it career or postsecondary education.

If the HSBP is to meaningfully benefit students, the ESN Coalition believes that it must be a robust and thoughtful process. Districts should take some additional measures to elevate it from a forgettable "check-the-box" exercise, and involve parents and guardians in the creation and implementation of the plan. Furthermore, we recommend that exceptions should only be made for students in unique and extenuating circumstances, and the default should be that a parent/guardian should have to sign off on a student's HSBP at least once a year and before the proposed courses begin.

**c. Ensure that parents with limited English proficiency can access the information.**

The rules should specify that parents be able to access information about the High School and Beyond Plan (HSBP) in their native language, in both written and verbal form depending on their request. It must be assured that all parents understand the implications of the HSBP for their children.

**d. Specify an appeals process that empowers students to take the most rigorous courses.**

Some courses, including advanced courses like AP and IB, have a cap on how many students may enroll. Schools should have a clear and transparent process for parents who want to appeal a decision to not allow their student to take a particular course.

**2) Rigor**

The ESN Coalition espouses the belief that a high school diploma should be meaningful. It should signal that a student is ready for the next step in life, whether that is a career or postsecondary education, and reflect the realities a young person will face as he/she enters the changing demands of our workforce. If a student is unable to meet that standard, we must foster an education system that supports him or her in meeting that bar. More focus should be placed on differentiating instruction and establishing multiple pathways depending on the learning needs and styles of students. The ESN Coalition has concerns that if we allow students to waive requirements that might be difficult for them, our education system runs the risk of giving up on the very students who have the highest need for the potential benefits of that system.

Therefore, we need to ensure that current achievement and opportunity gaps do not continue. Race, income, and zip code should not determine a student's educational trajectory but it is often the case that students of color, low-income students, students whose first language is not English, and students receiving special education services are disproportionately in courses that do not prepare them for career or postsecondary education.

As a 2013 study jointly written by the Washington Student Achievement Council, the State Board for Community and Technical Colleges, and the Workforce Training and Education Coordinating Board highlighted<sup>1</sup>:

- Washington is importing talent for many of the best jobs.
- Washington employers express increasing concern over finding employees in Washington with the skills needed to fill available jobs, most acutely in high-skill STEM and healthcare fields.
- By 2020, 65 percent of US jobs will require postsecondary education and training beyond high school.
- Skills identified as requirements for success are in the areas of communication, writing, critical thinking, and complex problem-solving.
- During recessions, the less-educated members of our communities are the hardest hit.
- Workers with a postsecondary education tend to earn 74–82 percent more than those with only a high school education or less.

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<sup>1</sup>The Excellent Schools Now (ESN) coalition includes nearly 40 education, business, and community-based organizations across Washington state working to achieve meaningful education reform that increases student achievement.

Given these realities, we strongly suggest the following:

**a. Restrict credits that may be waived to electives.**

The ESN Coalition supports the language in the State Board of Education’s proposed rule that would limit the credits that can be waived to those outside of the seventeen required subject credits in WAC 180-51-068 (1) through (7). We also note that E2SSB 6552 Sec. 202 (d) directs the State Board of Education to “adopt rules to implement the career and college ready graduation requirement proposal adopted under board resolution on November 10, 2010, and revised on January 9, 2014...”

- The November 10, 2010, resolution states that “all students will be enrolled in a common pathway that will keep all postsecondary options open...” and allows for up to two credits to be waived “if students need to retake courses to fulfill the state requirements.”<sup>ii</sup>
- The January 9, 2014, resolution reaffirms this and states that up to two credits may be waived “if students need to retake courses to fulfill the 17 core state requirements that all students must meet.”<sup>iii</sup>

The ESN Coalition strenuously objects to suggestions that would allow students to waive out of credits for core academic courses and not just one credit, but two. These suggestions are contrary to the resolutions explicitly mentioned in legislative language used to direct the State Board on implementation. As the legislature wrote E2SSB 6552, they had access to the resolutions above. If they had intended, as an entire body, for the State Board of Education’s implementation to vary from the resolutions that are explicitly mentioned in the legislation, it seems fair to assume that they would have made those variations explicit.

Allowing students to waive out of any credits would mean that a student could receive a high school diploma under any of the following scenarios:

- Algebra I as their *only* math credit
- *Only* one science course
- *Only* two English courses
- *No* arts courses

Given what we know about our changing economy and workforce needs, this is unacceptable. We need more from our public education system to ensure an informed electorate. We also must ensure that race and income do not determine educational outcomes. How well prepared for a career or postsecondary education would a student in any of the above scenarios be? What happens to those students?

**b. Provide more specificity and limitations around “unusual circumstances.”**

The proposed rules would allow a school district to “waive up to two of the credits required for graduation... for individual students for reason of unusual circumstances, as defined by the district.”

While the ESN Coalition understands the desire for flexibility, it should not come at the price of a standard that does not accurately reflect the demands of the job market. Students have different learning styles and educational trajectories, but without more specificity or guidance from the State Board, we run the risk of 295 different definitions of “unusual circumstances.”

To ensure that “unusual circumstances” are indeed unusual, ESN would support the State Board limiting the number of students who meet the threshold to 1 percent of student enrollment for each graduating class.

We also request clarification on WSSDA’s process for creating a model policy and how it will receive and incorporate input from community members, those affected by the rules, and other interested parties.

**c. Require transparency from school districts regarding student credits.**

School districts should report the number of students for whom credits are waived, the number of credits, the credits that were waived, and the demographic information for these students (FRL, special education status, ELL status, and race at a minimum).

Again, the ESN Coalition applauds the work of the State Board of Education and its staff on the work they have done up to this point. It has been a long journey and we look forward to seeing a College and Career Ready Diploma implemented successfully throughout Washington state. Thank you for your consideration and your action on this important issue.

Sincerely,

Excellent Schools Now Coalition

For a full list of coalition member organizations, please visit our website at <http://www.excellentschoolsnow.org/about-esn.html>.

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<sup>i</sup> A Skilled and Educated Workforce, WSAC, SBCTC, WTECB, October 2013

<http://www.wsac.wa.gov/sites/default/files/2013.11.16.Skills.Report.pdf>

<sup>ii</sup> Washington State Board of Education Resolution to Approve Washington State Graduation Requirements: Career & College Ready, <http://www.sbe.wa.gov/documents/2010.11.10%20Grad%20Req%20Resolution.pdf>

<sup>iii</sup> Washington State Board of Education Amended Resolution to Approve Washington State Graduation Requirement Framework: Career and College Ready, <http://www.sbe.wa.gov/documents/GradRequirements/2014GraduationRequirementResolution.pdf>



# The School Alliance

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Bellevue, Everett, Highline, Issaquah, Lake Stevens, Lake Washington, Mercer Island, Puyallup, Spokane, and Tahoma School Districts

May 6, 2014

Board Members  
Washington State Board of Education  
600 Washington St. SE  
Olympia, WA 98504

Dear State Board Members:

We request the opportunity to submit this letter in lieu of providing public comment during the 11:45 a.m.-12:00 p.m. time slot at the May 7th State Board of Education (SBE) meeting. As you know, the draft rules to implement E2SSB 6552 governing instructional hours, graduation requirements, and career and technical equivalencies were posted on the SBE website on April 30th. The draft rules prepared by the SBE staff will amend the Washington Administrative Code (WAC), and outline the process for the two new waivers authorized by E2SSB 6552:

- 1) the authority for school districts to waive up to two credits under unusual circumstances; and
- 2) the waiver to permit school districts to delay the start of the 24-credit requirements.

We understand that at the May 7th and 8th meeting, you may authorize the publication of the draft rules for public comment.

It appears that parts of E2SSB 6552 are subject to multiple interpretations. Some elements of the SBE staff's interpretation may not be consistent with how the Legislature intended 6552 to be implemented. Below please find three examples in Proposed WAC 180-51-068, which contains the proposed graduation requirements for students entering high school after July 1, 2015. (See Pages 23-31)

## **I. ISSUE ONE: Two-Credit Individual Waiver:**

During the 2014 Session, a number of bills were introduced to adopt the course credit framework set forth in SBE's January 2014 Resolution. Along with the required 24-credit course allocation, the January 2014 Resolution allowed for up to two credits to be waived, but only if a student attempted and failed the courses first. Additionally, the SBE waiver could only be used to waive

up to two of the seven elective or Personal Pathway Requirement courses, and only if the student needed to “fulfill the 17 core state requirements.”

Districts and others expressed the concern that the 24-credit diploma would not allow for sufficient flexibility, since it would need to be earned over four years during a typical six-period schedule. The SBE’s proposed waiver was perceived to be too restrictive and failed to take into account unusual circumstances that may arise in an individual student’s life. Potentially, this could lead to a decline in graduation rates.

The Legislature amended 6552 on this issue. The statute added the provision that the SBE must adopt a rule for a local waiver. In its final form, the law states that:

The rules must include authorization for a school district to waive up to two credits for individual students based on unusual circumstances and in accordance with written policies that must be adopted by each board of directors of a school district that grants diplomas.

E2SSB 6552, Sec. 202(1)(d)(i).

***SBE Staff Interpretation:*** In the draft rule, the SBE staff recognizes the authority of school boards to define “unusual circumstances.” The draft rule states that districts “may waive up to two of the credits required for graduation... for individual students for reason of unusual circumstances, as defined by the district.” Proposed WAC 180-51-068(12), Pages 30-31. However, the staff’s draft rules include an important restriction: Students receiving a one- or two-credit waiver must still earn the 17 required subject credits (English, Math, Science, Social Studies, Health and Fitness, Arts and CTE or Occupational Education). This restriction appears to be carried over from the January 2014 Resolution.

***Alternate Interpretation:*** The Legislature adopted a broad waiver instead of SBE’s January 2014 waiver. Within its directive to enact a waiver to be defined by school boards, the Legislature appears to have rejected SBE’s two-credit waiver and created a different waiver. Whether SBE has the authority to reinstate the 17-core subject requirement is unclear. In addition, the 17 credits in SBE staff’s draft rule would substantially restrict the scope of the waiver that the Legislature granted to school board. For example, this rule means that a school could not waive half a credit of physical education in a student’s last semester, even if the student requesting the waiver met the school board’s adopted definition of “unusual circumstances.”

## **II. ISSUE TWO: Delayed Implementation of 24 Credits to Class of 2020 or 2021:**

The statute allows districts to delay the implementation of the 24-credit requirement until the Class of 2020 or 2021. The SBE “shall grant a waiver... to an applying school district at the next subsequent meeting of the board after receiving an application.” E2SSB 6552, Sec. 202(1)(d)(ii).

***SBE Staff Interpretation:*** The staff’s draft rules propose an application deadline of May 1, 2015, for this waiver. Proposed WAC 180-51-068(11)(a)(iii), Page 30. The staff’s draft rule takes the position that the early deadline is needed to provide sufficient notice of each district’s graduation requirements to students, parents, and schools, at the start of high school.

***Alternate Interpretation:*** By the time the rules go into effect, the May 2015 deadline will be less than a year away. The deadline would force districts to make a decision within the next year about course requirements for students who are up to six years away from graduation. When it created the waiver, the Legislature did not impose a deadline. The waiver was designed to help districts and to serve district needs. Because the Legislature created a non-discretionary extension, the statute was intended to give districts greater certainty. The adopted language regarding the two-year delay comes from the Hunt floor amendment to the House Appropriations version of 6552. In its effect statement, the Hunt amendment states that it “[r]equires the SBE to grant a waiver to an applying school district at the next board meeting.” The House adopted the Hunt amendment and the Senate concurred with the House version.

Districts may need a longer period to request the delay. The statute allows districts to delay the implementation of the 24-credit requirement to the Class of 2020 or Class of 2021. Students who start 9th grade in fall 2015 or fall 2016 would not be harmed if they entered high school with the expectation that they needed 24 credits to graduate, and the district later changed the requirement to the district’s 22-credit requirement or to the State’s current 20-credit requirement. This is because students take a largely proscribed curriculum for the 9th and 10th grades, which would apply to either credit scheme.

## **III. ISSUE THREE: Role of Counselors and Principals:**

The staff’s draft rules would create a process for selecting the third science credit and third math credit. The intent of the Legislature may have been to allow student choice, but also to create a process that school districts could implement. E2SSB 6552 provides that:

The rules must also provide that the content of the third credit of mathematics and the content of the third credit of science may be chosen by the student based on

May 6, 2014

Page 4

the student's interests and high school and beyond plan with agreement of the student's parent or guardian or agreement of the school counselor or principal.

E2SSB 6552, Sec. 202(1)(d)(i) (emphasis added).

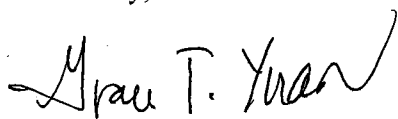
***SBE Staff Interpretation:*** The staff draft rule permits a school counselor or a principal to sign off on a science or math course selection, but only if the parent or guardian does not “respond to a request from the school for approval of a specific course.” Proposed WAC 180-51-068(2)(a)(iii), Pages 23-24, and Proposed WAC 180-51-068(3), Pages 25-26. These proposed rules change the process currently in place for approving the alternative third math credit, and would simultaneously apply the new process to the new third science credit.

***Alternate Interpretation:*** What are the implications of the Legislature's use of the word “or” between parent, guardian, counselor, or principal in E2SSB 6552? Is it an indication that the Legislature intended to allow several different people to sign off on the plan? It is unclear whether the proposed rule would impose an additional administrative burden on districts. As drafted, a school counselor or a principal may sign off on the science or math course selection only if the parent or guardian does not “respond to a request from the school for approval. . . .” Proposed WAC 180-51-068(2)(a)(iii), Pages 23-24, and Proposed WAC 180-51-068(3), Pages 25-26. This is a new requirement. See WAC 180-51-066(1)(b)(ii) and WAC 180-51-067(2)(b) for alternative language.

If the SBE adopts the proposed rule, what needs to be done to satisfy the new requirement? If records must be created and preserved, this rule would impose more paperwork on school districts. This could create unintended consequences.

If you have any questions, please call me at 206/623-7580. Thank you.

Sincerely,



Grace T. Yuan  
Legal Counsel

June 12, 2014 **Revised**



**Mukilteo**  
School District

Board Members  
State Board of Education  
PO Box 47206  
600 Washington ST SE  
Olympia, WA 98504-7206

Office of Superintendent - Dr. Marci Larsen  
9401 Sharon Drive • Everett WA 98204  
(425) 356-1220 • Fax (425) 356-1310

Re: Draft Rules for 24-Credit High School Diplomas

### **Credit Waiver**

Our District was very supportive of E2SSB 6552 and the goal of establishing more rigorous requirements for high school graduation, including the requirement to complete 24-credits. However, we share the concern expressed by many stakeholders and key lawmakers that raising the bar for earning a high school diploma could have a disproportionate negative impact on students who already struggle to meet the current graduation requirements.

We fully supported the more rigorous requirements because E2SSB 6552 provided what we considered necessary flexibility to ensure that the new requirements would not become another barrier to graduation for poor students, English Language Learners, homeless and Special Education students. We believe that the bill as passed by the Legislature provided adequate flexibility by including the course equivalency language and, most importantly, the ability to make a local determination to waive up to two (2) of the 24 credits for individual students, based on unusual circumstances.

As we read the statutory language and the language in the final Bill Report prepared by Legislative staff, we do not believe that the law as written limits the ability to waive up to two (2) credits to “personal pathway” credits or to elective credits. The Final Bill Report states that “By June 30, 2015, the Washington State School Directors' Association must adopt a model policy for granting individual student waivers of up to two course credits. The policy is to assist school districts in providing students the opportunity to complete graduation requirements without discrimination or disparate impact.” We believe the intent of the Legislature was to allow districts to waive up to two credits, including core credits. The Rules adopted by the State Board should reflect the language as passed by the Legislature.

### **Third Math Credit (Not Applicable to Comments on Draft Rules: Existing rule set to sunset)**

~~E2SSB 6552 states “The rules must also provide that the content of the third credit of mathematics and the content of the third credit of science may be chosen by the student based on the student's interests and high school and beyond plan with agreement of the student's parent or guardian or agreement of the school counselor or principal.”~~

~~The draft rules state that the third year must be Algebra 2 unless the following requirements are met: meets the high school and beyond plan, parents/guardians must agree, a meeting must be held with student and parent/guardian to advise them of requirements for two and four year~~

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~~colleges, and the parents/guardians must sign a form. Since the parent/guardian already has to agree to the fifth year plan, this seems redundant and burdensome.~~

### **HSBP**

We appreciate and support the goal to make the High School and Beyond Plan (HSBP) a meaningful tool for all students and parents by expanding the bare minimum defined in the current rules. The draft language in WAC 180-51-068 (10) would serve districts well as general guidelines and examples, but the requirement that all HSBPs **must include all** the elements in (a) through (d) is overly prescriptive, burdensome and time-consuming.

We are concerned that the requirement in (c) to develop a plan for students in 8<sup>th</sup> grade that includes a four-year high school course plan as well as a personalized pathway is not practical. Instead, we believe it is more reasonable for middle school students to learn more about career opportunities and explore their personal interests. Eighth grade students can then plan their FIRST year of high school courses after completing this exploratory work.

We believe the requirement in (d) *Identification of assessments required to graduate from high school, pursue post-secondary opportunities, and achieve the career or educational goals chosen in the student's high school and beyond plan*, is not really necessary. These goals are broadly met by the elements in (a) through (c).

The highest priority for the use of time in the school day will be to assure that all students have every opportunity to meet the new credit requirements for graduation; staff time will be better spent monitoring student progress and providing interventions to assist students in meeting the credit requirements than on developing highly detailed HSBPs.

Thank you for considering these concerns as you move forward with the development of the final rules.

Sincerely,



Marci L. Larsen, Ed.D.  
Superintendent

C. Board of Directors  
Senator Marko Liias, 21st District  
Rep. Lillian Ortiz-Self, 21st District  
Rep. Mary Helen Roberts, 21st District  
Senator John McCoy, 38th District

Rep. June Robinson, 38th District  
Rep. Mike Sells, 38th District  
Senator Steve Hobbs, 44th District  
Rep. Mike Hope, 44th District  
Rep. Hans Dunshee, 44th District



## Washington State Legislature

To: State Board of Education and Assistant Attorney General Colleen Warren

RE: Intent of E2SSB 6552 Amendments regarding 24 credit waivers

It has come to my attention that the rule proposed by the State Board of Education to implement E2SSB 6552 **only** allows the 7 “non-core” credits to be waived. **This contradicts the specific language of the session law for E2SSB 6552 and the documented legislative intent of this language.**

The intent of the amendments offered successfully to E2SSB 6552 was to **require a waiver to be available for *any* of the 24 credits required for graduation.**

**The session law effective June 12, 2014, now in Chapter 217, 2015 Laws PV, contains clear language that does not limit these waivers to any one type of credit required for graduation in Section 202:**

“(d) (i) The state board of education shall adopt rules to implement the career and college ready graduation requirement proposal adopted under board resolution on November 10, 2010, and revised on January 9, 2014, to take effect beginning with the graduating class of 2019 or as otherwise provided in this subsection (1) (d). **The rules must include authorization for a school district to waive up to two credits for individual students based on unusual circumstances and in accordance with written policies that must be adopted by each board of directors of a school district that grants diplomas. ...**”

The Legislature knew how to, if it desired, limit the waivers to elective or non-core credits. The Legislature very deliberately did not limit the waiver to non-core, because the intent of the language was to direct the State Board of Education to adopt rules which “must include” authorization for waiver of any two credits based on a student’s unusual circumstances.

The intent of this language is documented with the proposed and adopted amendments shown in the bill history for E2SSB 6552, and with Email correspondence with Office of Program Research staff on 2/24/14.

Draft language was for an amendment to Section 202 of E2SSB 6552, to ask that the State Board of Education adopt rules “**which include[d] authorization for a school district to waive up to two credits on an individual student basis in accordance with the rules established by the State Board of Education**”. This language has remained, and its effect was stated in my amendment, MCLA 978 introduced in the House Education Committee on 2/26/14.

These waivers would be to accommodate students who faced barriers to finishing school due to “medical condition, homeless status, or disability documented through an Individual Education Plan under Sec. 504 ...”

Below is a section of the draft amendment language which specifically addresses these points in E2SSB 6552, H AMD to H AMD (H-4469.1/14), which I introduced in the House Education Committee as an amendment to SB 6552 (6552-S2.E AMH ED MCLA 978) The intent was to ensure that students could **waive up to four credits from the total number of credits required for graduation, and did not specify what area of study they would be from:**

"NEW SECTION. Sec. 203. ... (1) The school district must provide a waiver of required credits based on criteria that take into account the unique limitations of a student to complete the required credits, which must include but not be limited to limitations associated with homelessness; poverty; limited English proficiency; medical conditions that impair a student's opportunity to learn; or disabilities, regardless of whether the student has an individualized education program or a plan under section 504 of the federal rehabilitation act of 1973.

(2) The school district must provide for a waiver of up to **four credits from the total number of credits required for graduation** if the student has not been provided with an opportunity to retake classes or enroll in remedial classes free of charge during the first four years of high school."



## **Comments on Proposed SBE Rules to E2SSB 6552**

Prepared by Wendy Rader-Konofalski, Washington Education Association

June 6, 2014

WEA has identified four sections of concern--three sections where we feel the SBE has stepped over the bounds of its authority and proposed rules that exceed the scope and intent of SB 6552 and one section which we feel needs a simple amendment. Those areas are:

1. The authority for school districts to waive up to two credits of the 24-credit framework for individual students under “unusual circumstances”
2. Mandating High School and Beyond Plans to begin in middle school
3. Adding extra requirements to the district waiver of the 24 credit framework
4. Laboratory Science definition

### **1. The authority for school districts to waive up to two credits for individual students of the 24-credit framework under “unusual circumstances”**

Request: We request removal of the stipulation that the two credit waiver does not apply to the so-called “seventeen core required credits.”

Rationale: The statute specifically gives school districts the authority “to waive up to two credits for individual students based on unusual circumstances and in accordance with written policies that must be adopted by each board of directors of a school district that grants diplomas. It also specifically requires WSSDA to adopt a model policy on this specific subject and gives them until June 30, 2015 to accomplish this task.

We would argue that this addition is not consistent with the spirit or intent of the amendment passed at the end of session which allowed this bill to be passed off the House floor. Legislators we have spoken to are clear that they did not intend any particular credits to be off limits to the two credit waiver. It limits local flexibility and it undermines the legislative requirement for WSSDA to create its model policy without a restriction on its charge. If the SBE promulgates rules one year in advance of the model policy requirement for WSSDA which isn't until June 2015, this appears to be an end run on the process as outlined in statute.

### **2. The timing of the High School and Beyond Plan**

Request: WEA requests removing the mandate to move HSBPs development into the middle school.

Rationale: Section 202 (1)(c) in E2SSB 6552 stipulates that “Any decision on whether a student has met the state board’s high school graduation requirements for a high school and beyond plan shall remain at the local level.”

Yet SBE proposed rule (WAC 180-51-068) puts into place a requirement that “high school and beyond plan “must include... a four year plan for course-taking created in **middle school grades.**” (10)(c)

While there might be merit to starting work on the HSBP in middle school, the fact is that that is not a requirement at this time. Including HSBP as a requirement in middle school would, in fact, be an entirely new policy which has not been vetted through the legislative process and remains entirely outside of the scope and authority of the SBE to mandate in rules.

Before any decisions about moving HSBPs into middle school, policy discussions with stakeholders to consider workload implications, funding and staffing needs, including especially counseling staffing at the middle school level would have to take place through the legislative process—not SBE rulemaking. RCW 28A.305.135 requiring the SBE to conduct a school district fiscal impact statement for any significant rule changes would apply.

### **3. Extra requirements for district waiver of 24 credit framework**

Request: Remove language that requires a school district resolution to accompany a waiver application.

Rationale: According to section 202 (1)(ii), districts wishing to waive the 24 credit framework for up to two years can apply by describing “why the waiver is being requested, the specific impediments preventing timely implementation, and efforts that will be taken to achieve implementation with the graduating class proposed under the waiver. **The SBE shall grant a waiver under this subsection (1)(d) to an applying school district at the next subsequent meeting of the board after receiving an application.**

In SBE’s proposed rules, WAC 185-51-068 (11)(a)(ii), **an additional requirement is mandated that the application “Be accompanied by a resolution adopted by the district board of directors requesting the waiver under this section. The resolution shall state the entering freshman class or classes for whom the waiver is requested, and be signed by the board chair or president and district superintendent.”**

This may be a good idea, and in fact it may be something that districts will want to do. However, it is a mandate and adds a step to the waiver process that the statute does not require. Since the legislature very intentionally made this a waiver that should be easy and quickly expedited by the SBE without any options for denying the request, such a requirement is not warranted and continues a pattern of the SBE overstepping their authority and the bounds of statute in their rule-making process.

#### 4. Laboratory Science definition

Request: Add to the NSTA definition of lab science, the NSTA definition of “Support for Science Labs”

Rationale: SB 6552 does not contain a definition for Lab science. The new 24 credit framework requires that all students take three credits of science, two of which must be in laboratory science.

SBE proposed rules, WAC 180-51-068 (14)9a) defines laboratory science as “any instruction that provides opportunities for students to interact directly with the material world, or with data drawn from the material world, using the tools, data collection techniques, models and theories of science. A laboratory science course meeting the requirement of this section may include courses conducted in classroom facilities specially designed for laboratory science, or coursework in traditional classrooms, outdoor spaces, or other settings which accommodate elements of laboratory science as identified in this subsection.

We think this definition might be a good idea as it provides flexibility for schools and teachers in the delivery of lab science courses. However, insofar as it also might impinge negatively on a district’s funding requests or needs for traditional lab classrooms, we would suggest an addition to this definition. It appears that the definition SBE has used here comes from the National Science Teachers Association. That being the case, there is another part to the NSTA definition which would clarify the issue and we suggest all of salient portions of it be included in the SBE proposed rules definition of lab science:

#### Support for Science Labs

To ensure that laboratory investigations are implemented in schools, administrative support is crucial. NSTA recommends that the school administration recognize the instructional importance, overarching goals, and essential activities of laboratory investigations and provide the following:

- An adequate facility where labs can be conducted. At the preschool and elementary levels, this means a classroom with sufficient work space, including flat moveable desks or tables and chairs, equipment, and access to water and electricity. At the middle and high school levels, a safe, well-equipped lab space should be available, with necessary equipment and access to water and electricity. In addition, appropriate facilities to work with students with special needs should be provided. (Beihle 1999)
- Adequate storage space for all materials, including devices and materials in common use that are considered hazardous. (Beihle 1999)
- Funding for yearly educator training on how to manage materials and guide inquiry-based learning during labs.

- A budget for regular maintenance of facilities and equipment, as well as annual costs for new or replacement equipment, supplies, and proper waste management.
- A budget that recognizes additional costs required for field experiences.
- Laboratory occupancy load limits (number of occupants allowed in the laboratory) set at a safe level based on building and fire safety codes, size and design of the laboratory teaching facility, chemical/physical/biological hazards, and the needs of the students (Roy 2006; NSTA 2000). Science classes should have no more than 24 students even if the occupancy load limit might accommodate more. (NSTA 2004) Research data shows that accidents rise dramatically as class enrollments exceed this level. (West 2001) Teachers should not be faced with a Hobson's choice—teach in an unsafe environment or sacrifice the quality of teaching by not doing labs.



## Teachers and students Lexi Summerato at Kent-Meridian High School

I am the teacher of these fabulous students. Meridian Knowledge academy? Asked to attend by the Board of Education group to talk about parent involvement as you seek to make changes, our take on how parents might be involved as you make rules. As a teacher, I am with my kids for 180 hours. Parents are with students more, ten times as many?!? Parents I don't think have the say that they need to have on a consistent basis, particularly at the middle and high school level, especially with the HSBP, with decisions to hold students back at the middle school level. There is a lot of research around that. But, many parents have expressed discontent with not having more say in these graduation requirements, especially after becoming more rigorous, which I totally agree with. I think parents need to be more involved in what classes their students are taking, when they are going to retake things, how high they are going to go, what kind of challenging classes they are going to take. Also, parents need to be educated a lot more on the requirements. We educate our students quite a bit, but our parents aren't in our classes. We try to send flyers to the parents and provide electronic materials to them. There needs to be new ideas on this, innovative ideas, on how to get this information out to parents and on what their kids are doing during the day, what they are doing to get through system of school, particularly in my school where there are more migrant parents from other countries who don't understand the American system. The American system is a lot different from other systems, particularly for countries that do not have a formal education system. They don't understand any of it. They are expecting their children to get all of the information for them. So, there has to be a better way to get information from the state-level and the district-level to the parents' hands.

Sammy Hue – I was going to high school in \*\*\*\*Inaudible for a moment\*\*\*\*. Before going to high school. We have over 70 languages at my school. I was very involved in my academic career. I had an older brother who already went through high school. Many parents of the students are refugees, English Language Learners, or do not live in the US at all. They don't know much about the system. They have a hard time getting involved in the system because we do not have ways to communicate with them or build a relationship to make them comfortable with getting involved in the school and the students' lives. We identified a problem in the community and tried to determine a solution. We identified the low graduation rate and how parent involvement can affect that. She cited graduation statistics from the Kent school district and offered information on Kent schools. We believe that parent involvement is very important for student success. She cited a study that found that, regardless of family income or background, parent involvement improves student grades, attendance, social skills, behavior, and chance of graduation. Parent support helps them to overcome language barriers, culture differences, and lack of relationship between students and faculty.

Next student \*\*\*\*Audio is inaudible at this point\*\*\*\* – Her parents want to be more involved, but her parents work full time jobs and raise her siblings. She supports parent involvement Star – Was in Arizona, moved to WA. During her freshmen year of high school, her mom wasn't super involved. She needed a push to be more involved in school, but there was no one really there so she slacked off a bit. \*\*\*\*Audio becomes inaudible at this point.\*\*\*\* Migrant students need extra support to keep them involved. Parent and guardian support is incredibly important for student success.

Shelby Cornish – Parents and guardian involvement is very important for student success. She told the story of what schools she went to and how classes were structured. She was not used to

the grading and school system. Her parents would make sure she worked hard in school while she was having difficulty. Children and teenagers need adult support to keep on going. Another student – PASSIVE program. This is a nine-week program that improves parent involvement and provides information about the school. There is work interfering, language barriers, transportation issues. She proposed a PASSIVE app so improve parent involvement. It would allow parents to use mobile device applications so that they could access the program without being able to speak English or attend. It would be available in multiple languages for parent involvement.

**Jerry Bender, Association of Washington School Principals**

Good afternoon, I am Jerry Bender with the Association of Washington School Principals. Thanks State Board for including us in the discussion. We appreciate the work that has been done and glad to have been a part of it. There is still one area of concern for us and it deals with the agreement between students, parents, and guardians for a school around the third math credit. That is in section 202 of the law. And the proposed rule says with agreement of the student's parent or guardian, or if the parent or guardian is unavailable and do not respond to the request from the school for approval of a specific course agreement of the school counselor or principal. The issue that would be helpful to get resolved is when there is a dispute between what that third math or science credit should be, who has the ultimate card. If the student chooses, then the parents feel shut out of the process if there is a difference in opinion between the student and the parent. If the parent chooses, then, ultimately, between the two, again if there is a dispute, then the involvement of the parent will feel slighted. And, in the same vein, if the student is going to choose then you probably don't need the involvement of the principal or the counselor. So, the hiccup of it is, and the law says, either the parent or the student, but it is silent if there is a disagreement between the two. So, that issue needs to be resolved before it gets to the building level. I would be glad to work with State Board of Education staff to resolve that one. But that is one that has popped up on our radar screen. With that, I will take questions.

Ben Rarick: Do you have a solution for this?

Mr. Jerry Bender: I have some ideas for solutions that I will work with the Jack on and we have visited some.

**Representative Sam Hunt and Representative Chris Reykdal**

Thank you for the opportunity. I don't know if we will be able to make it to Spokane in July but we can certainly put our oar in the water on this one. I want to start out with a little background on 6552 from a legislative standpoint and how we got to where we are today. For those of you who don't watch TV-W every day, hour-by-hour, which is probably most of you I hope. This bill passed in the very waning days of this year's session and we were at a stage where we didn't think we were going to get a bill. There was so much disagreement about what should be in it. Not only the 1080 hours, but the 24 credits, some of the parental involvement, dealing with kids with different abilities, waivers, and when do we implement this and all that. We had a list of amendments in the House, I think there were 14 amendments. We had a democratic caucus that was probably the longest caucus on any individual bill this year. I think it exceeded two hours and, you know, we went through point-by-point. Finally, one of the members stood up and said "You know I love you all, but I'm not the education guy in the room, I could for all of these, I could vote for none of these, I don't know what to do" so we took a break and did a little vote count. At the same time, the speaker of the House Frank Chopp called a couple of us into the office, I guess you could call it the principal's office, and said "can you work tonight? This is

about 4 o'clock in the afternoon and said "Can you work tonight and work up something that we could get 50 votes for tomorrow. And we sort of froze in our spots and kind of got the deer in the headlights look. To get something like this and turn this around in 12 hours, Representative Reykdal and some staff got together with staff and looked through the amendments. We crafted one amendment that took all of the key points that we thought were in the 14 amendments and put one amendment together from all of the amendments and put that amendment into the bill. It was up to us as members to get support. We had to get our members because we wanted bipartisan support. We had to talk to the Republican members of the House. It would be great if it got all of the votes in one chamber, but that wouldn't pass the bill when it went to the senate and didn't pass then you still wouldn't be there. So we had to go talk to the House and get support from the House and the Senate and all of the special interest groups and the various education groups that were deeply involved in this bill. Oddly enough, in this 12 hour period, turned out to be more like a 24 hour period, we came together on this amendment and the bill passed and it went to the Senate and passed with an overwhelming vote. We got strong bipartisan vote from the House and from the Senate and we sent the bill to the Governor and he signed it. It looked easy at the time but it wasn't and there were a lot of tipping points in this and that's what we're concerned about. It is an important point that it wasn't a foregone conclusion and we put our amendment out and, on the house floor, we were told that there was no way the Senate would go along with that.... When we put this together, we said the Senate wouldn't like that! When the Senate got it, they thought they could go along with it. When we talked to the Governor's staff, we talked to Marcie and others, and they thought they could go along with it. You have to realize, there is never a perfect bill, and there are things. When we go to the education formal query, we will have to keep looking and be finding and modifying. It was something that came together almost miraculously and it wasn't easy. It was a very tough decision. It is something that Representative Reykdal and a few of the others who were on the education and higher education committees were looking at.

Representative Reykdal has a few points

I'm state representative Reykdal, Legislature, House member from the 22<sup>nd</sup> district here in Olympia. To feed off of what Sam said, and bring up three points that I want to make clear. I want to be very candid where we had a conversation and make it explicit where we had a conversation and where we did not have a discussion on it and it is wide open and is subject to interpretation and, maybe, some recommendations moving forward.

First, most importantly, is the two-credit waiver. We clearly did not have the votes for this legislation until both chambers got together. One of my roles was to be liaison to the House Republican Caucus. I think that it was very clear that their priority was local control and flexibility for students. Those were two things that they consistently brought forward.

Representative David Taylor was the primary spokesperson for them in this conversation. At the end, the bill does not say that the two credits should be limited to the last seven – the seven flexible credits. It says two credits. It is pretty clear. This where I want to be candid with you and say that some of us are quite nervous that this would allow for an individualized education plan that says that I want to take Algebra I during my first year of high school then never take another math credit.

The language that we put in there is unusual circumstances. Here is your legislative lesson for the day. That language means nothing once you pass a bill. That language is open to interpretation and our intent is to suggest to you that if we were very intentional about this then



our intent was to keep the two credits open to all 24 credits, not just the seven flexible credits in the requirements. But we would have really clarified what those two words mean.

The intent is to get students to take more math and science - three credits of math and three credits of science. But there truly are unusual circumstances where students need to opt out of that. We just want to leave you our idea on that. We also share some nervousness that State Board of Education staff share that this path is less rigorous. That is not the intent. It should be more rigorous with some flexibility.

Second, to clarify the intent on parents. Parents work with students. The presumption today as a school counselor is that you work out that course schedule with a student and that course information gets entered and there is a presumption that the student will work on that with their parents. I think we wanted to make that a stronger connection. Our druthers to you is that we think you are on the right track to make the student and parent come first, and the counselor and principal are in the backseat in that relationship. We don't have answers and we didn't speak explicitly about what would happen when there is a disagreement between a student and a parent. Those conflicts happen today and it moves forward. Those conflicts are really something for the home to figure out. The other thing that we really didn't figure out is this implies that there is an administrative burden between parent and student. If 60,000 sheets of paper go home to get sign to say "yes, I affirmatively agree with the schedule that my student is contemplating here." This is something that we didn't discuss and whether there should be more documentation or less.

The third issue is with respect to the High school and beyond plan. When I wear my other hats as college administrator and board member on a private education foundation. I can tell you that I put a decade into this concept of high school and beyond planning. Everything that the State Board of Education is working on and learning for the HSBP is right on track. These things don't work unless they start in the 7<sup>th</sup> or 8<sup>th</sup> grade or even earlier. That said, we had a discussion with a group of people who wrote the striking amendment for this bill and that was one of those areas where we just did not get to in any detail. We agree with the policy construct that this has to happen early but the legislative language is extremely clear in this case. It says that local districts make that determination. So, our recommendation to the Board is that you do not write a rule that prescribes 7<sup>th</sup> through 8<sup>th</sup> grade. Even though the policy is in the right direction, it would create a conflict with legislation and we are already talking about coming back next year with lots of research and creating clarification about a High School and Beyond Plan timeline and the clarification on the unusual circumstances. We know that we owe you a bit more work, but it would be premature to go with 7<sup>th</sup> and 8<sup>th</sup> grade this year in our opinion with the absence of that work on our part. I will pause if staff or anyone else has any questions.

Jack Archer: I do have a question, Representative Reykdal. Is it your opinion that the proposed language on the agreement of et cetera et cetera in regards to the third math course or third science course? That has been a little bit challenging.

Chris Reykdal: Yeah, commas matter, we probably didn't put the commas in the right order on all of the "or"s. Based on conversations and subsequent conversations about the final striking amendment. On the proposed rule, we think you are on the right track here. You are putting the parent in the right position of first with the student, you are putting the counselor or principal in the second position. I suppose there are lots of snarls when a parent is not involved in a child's life and somebody else is going to have to sign off on that form, which historically has been a school counselor.



Jack Archer: That is our intent. It has not just been our intent, but we have discerned that to be the intent of the Legislature on the placement of the “or”s and the vowels.

Chris Reykdal or Sam Hunt (Whose voice it is is not clear from the recording): I want to add just one last quick thing. We worked on this bill all session but this final amendment came through at the very end in a rush. And I think that is part of the reason why we have all of these “or”s strung in there. No literature major went through this. Unusual circumstances is hard to define so we directed the Washington State School Director’s Agency, it is a state agency, we directed this agency to develop a model policy that school district boards of directors can use when they implement this graduation requirement process. Hopefully, and they have done this a lot before, I have faith that we can work with them and work with the State Board and we will get to a good point there. There is that intervening where SBE and WSSDA can work together and work with school districts to try to put some fences around unusual circumstances and the whole process for waiver.

Jack Archer: Just to clarify on the High School and Beyond Plan, your belief, your view, is that the components, the elements of the High School and Beyond Plan go further than legislative intent.

Ben Rarick: There are two issues here: one is the components and the other is the 7<sup>th</sup> and 8<sup>th</sup> grade issue that you raised. Now, I will say that in the discussion with the Board, it became pretty apparent that there actually is no way to do a HSBP without 8<sup>th</sup> grade because the students are choosing what they will take during 9<sup>th</sup> grade during 8<sup>th</sup> grade. So we felt like we are stating what is. But by stating what is and by raising the issue of 8<sup>th</sup> grade, we are raising the profile of the issue. Perhaps more than just the selection of courses would happen in 8<sup>th</sup> grade, but also that full-blown planning would occur in 8<sup>th</sup> grade. But, if that is counter to your intent. But the clarity that I am seeking here is that there is a difference between these components versus the 8<sup>th</sup> grade issue.

Chris Reykdal: The components are excellent. Even the initiation in 7<sup>th</sup> and 8<sup>th</sup> grade is great from a policy standpoint and that is where I am trying to be very clear with you. What we are trying to avoid here is to put it in rules today with absence of law. The law is very clear here and it says it is up to local districts. You don’t get a lot of flexibility there and we need it to say “subject to the rules of the State Board.” We probably should have said that here but we didn’t. Probably what the better pathway here is, in coordination with the State Board and OSPI and other policy experts, send out supplemental material that says “folks, this is the way this works best – from researchers across the entire nations, this is what works best here and it starts in the 8<sup>th</sup> grade, these are the components and the elements,” but I would just hesitate to put in rule the number 7 or number 8 because I do think it creates a conflict with the law.

Ben Rarick: Thank you for the clarification.

Sam Hunt: You can request it next year... we can just work on it next year.

Ben Rarick: That is actually a hugely important clarification. We will leave in the components but the Board will consider the striking of the reference to 8<sup>th</sup> grade.

Sam Hunt: Anything else?

Ben Rarick: I want to thank you gentleman for taking the time and thanks for all the work you’ve done.

## Webinar: Forum on Rules to Implement E2SSB 6552

June 6, 2014

### Questions/Comments by Online Attendees

#### **Mary Beth Tack asked/commented:**

- Give a couple of examples of "extenuating circumstances" for the 2 credit waiver
- Currently we have the Washington State Diploma (20 credits).....is this option completely removed. The only option is the 24 credit with the unusual/rare option of 24 (with 2 waived)?! Is that correct.....can you specifically talk about this.
- Will additional continued \$\$ be directed to the implementation of 24 credit requirement from McCleary above and beyond - consistently each year
- Clarification: There is contradiction. In the SBE paperwork the 2 credits that can be waived can be on ONLY Arts and/or World (based on PPR).....I believe the individual that just spoke said it was only on Math & Science. Clarify.

#### **Jim Kowalkowski asked/commented:**

- This is Jim Kowalkowski from Davenport. I wanted to thank the two legislators for their testimony and their insight. The 2 credit waiver flexibility will be used wisely and carefully by districts. Thank you for trusting our public schools---this is a message we do not always hear.
- I do have just a couple of comments and a couple of questions. The proposed wording to WAC 180-16-200 looks very good and I appreciate the language stating that a district-wide annual average of one thousand twenty-seven instructional hours in grades 1 through 12 will meet the requirement. My question regarding this is the five-day waiver for seniors...can we still count these 5 days as instructional time and is it addressed already in a WAC?
- This is Jim from Davenport again, my other comment and question is regarding the amended proposed language for WAC 180-51-067. The language regarding a required culminating projects is stricken...why not amend this with, "Depending on local school board policy"...and keep the language. For many districts, the Culminating Project is a great thing and the WAC could clearly state that this is a local decision. Thank you!
- Thanks for letting folks participate in this webinar. It is very much appreciated. We have our graduation ceremony tomorrow and there is no way I can miss that! Thanks again.

#### **Grace Yuan asked/commented:**

- This is Grace Yuan. I am commenting on behalf of the School Alliance. I would like to thank Representative Hunt and Representative Reykdal for the comments that they provided this afternoon. Their statements outline the legislative intent to allow the two-credit waiver to apply to all 24 credits. We endorse this approach and support the local decision making process by elected school board members. We look forward to working with the State Board on amendments to this proposed rule. Thank you.



June 16, 2014

Dear Washington State Board of Education members and staff,

On behalf of the undersigned organizations and our constituencies, please accept this letter as jointly endorsed comments in response to the proposed rules to implement E2SSB 6552.

The Excellent Schools Now (ESN) Coalition applauds the work of the State Board members and staff in advocating for, supporting, and now implementing updated high school graduation requirements. We also believe that improvements should be made to the rules. Our comments center around two main topics: parent engagement and academic rigor.

### **1) Parent engagement**

While we appreciate the State Board's effort to support parent engagement in the proposed rules, we feel strongly that the rules can and should do more.

#### **a. Require parent signoff on the third year of math and science.**

The current graduation requirements require a meeting with the student, parent/guardian, and a high school representative; and a signed form acknowledging the meeting if the student pursued a third credit other than Algebra II or Integrated Mathematics III. (WAC 180-51-067)

The proposed rules currently require a third credit of math or science "...with agreement of the student's parent or guardian, or, if the parent or guardian is unavailable or does not respond to a request from the school for approval of a specific course, agreement of the school counselor or principal."

We believe that the language is unclear as to whose burden of proof it is that the parent or guardian is unavailable or did not respond. The school should affirmatively show that they have made attempts to engage the parents. There should be accommodations made for students who are in exceptional circumstances, but exceptional circumstances should not dictate the default for all students and their families. The requirements for parent engagement and signoff should be, at the least, at the same level as the prior graduation requirements, not at a lower level.

#### **b. Require parent signoff at least once every school year on the High School and Beyond Plan.**

The High School and Beyond Plan (HSBP) is meant to guide a student's high school experience and prepare the student for the next step in his or her career, be it career or postsecondary education.

If the HSBP is to meaningfully benefit students, the ESN Coalition believes that it must be a robust and thoughtful process. Districts should take some additional measures to elevate it from a forgettable "check-the-box" exercise, and involve parents and guardians in the creation and implementation of the plan. Furthermore, we recommend that exceptions should only be made for students in unique and extenuating circumstances, and the default should be that a parent/guardian should have to sign off on a student's HSBP at least once a year and before the proposed courses begin.

**c. Ensure that parents with limited English proficiency can access the information.**

The rules should specify that parents be able to access information about the High School and Beyond Plan (HSBP) in their native language, in both written and verbal form depending on their request. It must be assured that all parents understand the implications of the HSBP for their children.

**d. Specify an appeals process that empowers students to take the most rigorous courses.**

Some courses, including advanced courses like AP and IB, have a cap on how many students may enroll. Schools should have a clear and transparent process for parents who want to appeal a decision to not allow their student to take a particular course.

**2) Rigor**

The ESN Coalition espouses the belief that a high school diploma should be meaningful. It should signal that a student is ready for the next step in life, whether that is a career or postsecondary education, and reflect the realities a young person will face as he/she enters the changing demands of our workforce. If a student is unable to meet that standard, we must foster an education system that supports him or her in meeting that bar. More focus should be placed on differentiating instruction and establishing multiple pathways depending on the learning needs and styles of students. The ESN Coalition has concerns that if we allow students to waive requirements that might be difficult for them, our education system runs the risk of giving up on the very students who have the highest need for the potential benefits of that system.

Therefore, we need to ensure that current achievement and opportunity gaps do not continue. Race, income, and zip code should not determine a student's educational trajectory but it is often the case that students of color, low-income students, students whose first language is not English, and students receiving special education services are disproportionately in courses that do not prepare them for career or postsecondary education.

As a 2013 study jointly written by the Washington Student Achievement Council, the State Board for Community and Technical Colleges, and the Workforce Training and Education Coordinating Board highlighted<sup>1</sup>:

- Washington is importing talent for many of the best jobs.
- Washington employers express increasing concern over finding employees in Washington with the skills needed to fill available jobs, most acutely in high-skill STEM and healthcare fields.
- By 2020, 65 percent of US jobs will require postsecondary education and training beyond high school.
- Skills identified as requirements for success are in the areas of communication, writing, critical thinking, and complex problem-solving.
- During recessions, the less-educated members of our communities are the hardest hit.
- Workers with a postsecondary education tend to earn 74–82 percent more than those with only a high school education or less.

Given these realities, we strongly suggest the following:

**a. Restrict credits that may be waived to electives.**

The ESN Coalition supports the language in the State Board of Education’s proposed rule that would limit the credits that can be waived to those outside of the seventeen required subject credits in WAC 180-51-068 (1) through (7). We also note that E2SSB 6552 Sec. 202 (d) directs the State Board of Education to “adopt rules to implement the career and college ready graduation requirement proposal adopted under board resolution on November 10, 2010, and revised on January 9, 2014...”

- The November 10, 2010, resolution states that “all students will be enrolled in a common pathway that will keep all postsecondary options open...” and allows for up to two credits to be waived “if students need to retake courses to fulfill the state requirements.”<sup>ii</sup>
- The January 9, 2014, resolution reaffirms this and states that up to two credits may be waived “if students need to retake courses to fulfill the 17 core state requirements that all students must meet.”<sup>iii</sup>

The ESN Coalition strenuously objects to suggestions that would allow students to waive out of credits for core academic courses and not just one credit, but two. These suggestions are contrary to the resolutions explicitly mentioned in legislative language used to direct the State Board on implementation. As the legislature wrote E2SSB 6552, they had access to the resolutions above. If they had intended, as an entire body, for the State Board of Education’s implementation to vary from the resolutions that are explicitly mentioned in the legislation, it seems fair to assume that they would have made those variations explicit.

Allowing students to waive out of any credits would mean that a student could receive a high school diploma under any of the following scenarios:

- Algebra I as their *only* math credit
- *Only* one science course
- *Only* two English courses
- *No* arts courses

Given what we know about our changing economy and workforce needs, this is unacceptable. We need more from our public education system to ensure an informed electorate. We also must ensure that race and income do not determine educational outcomes. How well prepared for a career or postsecondary education would a student in any of the above scenarios be? What happens to those students?

**b. Provide more specificity and limitations around “unusual circumstances.”**

The proposed rules would allow a school district to “waive up to two of the credits required for graduation... for individual students for reason of unusual circumstances, as defined by the district.”

While the ESN Coalition understands the desire for flexibility, it should not come at the price of a standard that does not accurately reflect the demands of the job market. Students have different learning styles and educational trajectories, but without more specificity or guidance from the State Board, we run the risk of 295 different definitions of “unusual circumstances.”

To ensure that “unusual circumstances” are indeed unusual, ESN would support the State Board limiting the number of students who meet the threshold to 1 percent of student enrollment for each graduating class.

We also request clarification on WSSDA’s process for creating a model policy and how it will receive and incorporate input from community members, those affected by the rules, and other interested parties.

**c. Require transparency from school districts regarding student credits.**

School districts should report the number of students for whom credits are waived, the number of credits, the credits that were waived, and the demographic information for these students (FRL, special education status, ELL status, and race at a minimum).

Again, the ESN Coalition applauds the work of the State Board of Education and its staff on the work they have done up to this point. It has been a long journey and we look forward to seeing a College and Career Ready Diploma implemented successfully throughout Washington state. Thank you for your consideration and your action on this important issue.

Sincerely,

Excellent Schools Now Coalition

For a full list of coalition member organizations, please visit our website at <http://www.excellentschoolsnow.org/about-esn.html>.

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<sup>i</sup> A Skilled and Educated Workforce, WSAC, SBCTC, WTECB, October 2013

<http://www.wsac.wa.gov/sites/default/files/2013.11.16.Skills.Report.pdf>

<sup>ii</sup> Washington State Board of Education Resolution to Approve Washington State Graduation Requirements: Career & College Ready, <http://www.sbe.wa.gov/documents/2010.11.10%20Grad%20Req%20Resolution.pdf>

<sup>iii</sup> Washington State Board of Education Amended Resolution to Approve Washington State Graduation Requirement Framework: Career and College Ready, <http://www.sbe.wa.gov/documents/GradRequirements/2014GraduationRequirementResolution.pdf>

# The School Alliance

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Bellevue, Everett, Highline, Issaquah, Lake Stevens, Lake Washington, Mercer Island, Puyallup, Spokane, and Tahoma School Districts

May 6, 2014

Board Members  
Washington State Board of Education  
600 Washington St. SE  
Olympia, WA 98504

Dear State Board Members:

We request the opportunity to submit this letter in lieu of providing public comment during the 11:45 a.m.-12:00 p.m. time slot at the May 7th State Board of Education (SBE) meeting. As you know, the draft rules to implement E2SSB 6552 governing instructional hours, graduation requirements, and career and technical equivalencies were posted on the SBE website on April 30th. The draft rules prepared by the SBE staff will amend the Washington Administrative Code (WAC), and outline the process for the two new waivers authorized by E2SSB 6552:

- 1) the authority for school districts to waive up to two credits under unusual circumstances; and
- 2) the waiver to permit school districts to delay the start of the 24-credit requirements.

We understand that at the May 7th and 8th meeting, you may authorize the publication of the draft rules for public comment.

It appears that parts of E2SSB 6552 are subject to multiple interpretations. Some elements of the SBE staff's interpretation may not be consistent with how the Legislature intended 6552 to be implemented. Below please find three examples in Proposed WAC 180-51-068, which contains the proposed graduation requirements for students entering high school after July 1, 2015. (See Pages 23-31)

## **I. ISSUE ONE: Two-Credit Individual Waiver:**

During the 2014 Session, a number of bills were introduced to adopt the course credit framework set forth in SBE's January 2014 Resolution. Along with the required 24-credit course allocation, the January 2014 Resolution allowed for up to two credits to be waived, but only if a student attempted and failed the courses first. Additionally, the SBE waiver could only be used to waive

up to two of the seven elective or Personal Pathway Requirement courses, and only if the student needed to “fulfill the 17 core state requirements.”

Districts and others expressed the concern that the 24-credit diploma would not allow for sufficient flexibility, since it would need to be earned over four years during a typical six-period schedule. The SBE’s proposed waiver was perceived to be too restrictive and failed to take into account unusual circumstances that may arise in an individual student’s life. Potentially, this could lead to a decline in graduation rates.

The Legislature amended 6552 on this issue. The statute added the provision that the SBE must adopt a rule for a local waiver. In its final form, the law states that:

The rules must include authorization for a school district to waive up to two credits for individual students based on unusual circumstances and in accordance with written policies that must be adopted by each board of directors of a school district that grants diplomas.

E2SSB 6552, Sec. 202(1)(d)(i).

***SBE Staff Interpretation:*** In the draft rule, the SBE staff recognizes the authority of school boards to define “unusual circumstances.” The draft rule states that districts “may waive up to two of the credits required for graduation... for individual students for reason of unusual circumstances, as defined by the district.” Proposed WAC 180-51-068(12), Pages 30-31. However, the staff’s draft rules include an important restriction: Students receiving a one- or two-credit waiver must still earn the 17 required subject credits (English, Math, Science, Social Studies, Health and Fitness, Arts and CTE or Occupational Education). This restriction appears to be carried over from the January 2014 Resolution.

***Alternate Interpretation:*** The Legislature adopted a broad waiver instead of SBE’s January 2014 waiver. Within its directive to enact a waiver to be defined by school boards, the Legislature appears to have rejected SBE’s two-credit waiver and created a different waiver. Whether SBE has the authority to reinstate the 17-core subject requirement is unclear. In addition, the 17 credits in SBE staff’s draft rule would substantially restrict the scope of the waiver that the Legislature granted to school board. For example, this rule means that a school could not waive half a credit of physical education in a student’s last semester, even if the student requesting the waiver met the school board’s adopted definition of “unusual circumstances.”



## **II. ISSUE TWO: Delayed Implementation of 24 Credits to Class of 2020 or 2021:**

The statute allows districts to delay the implementation of the 24-credit requirement until the Class of 2020 or 2021. The SBE “shall grant a waiver... to an applying school district at the next subsequent meeting of the board after receiving an application.” E2SSB 6552, Sec. 202(1)(d)(ii).

***SBE Staff Interpretation:*** The staff’s draft rules propose an application deadline of May 1, 2015, for this waiver. Proposed WAC 180-51-068(11)(a)(iii), Page 30. The staff’s draft rule takes the position that the early deadline is needed to provide sufficient notice of each district’s graduation requirements to students, parents, and schools, at the start of high school.

***Alternate Interpretation:*** By the time the rules go into effect, the May 2015 deadline will be less than a year away. The deadline would force districts to make a decision within the next year about course requirements for students who are up to six years away from graduation. When it created the waiver, the Legislature did not impose a deadline. The waiver was designed to help districts and to serve district needs. Because the Legislature created a non-discretionary extension, the statute was intended to give districts greater certainty. The adopted language regarding the two-year delay comes from the Hunt floor amendment to the House Appropriations version of 6552. In its effect statement, the Hunt amendment states that it “[r]equires the SBE to grant a waiver to an applying school district at the next board meeting.” The House adopted the Hunt amendment and the Senate concurred with the House version.

Districts may need a longer period to request the delay. The statute allows districts to delay the implementation of the 24-credit requirement to the Class of 2020 or Class of 2021. Students who start 9th grade in fall 2015 or fall 2016 would not be harmed if they entered high school with the expectation that they needed 24 credits to graduate, and the district later changed the requirement to the district’s 22-credit requirement or to the State’s current 20-credit requirement. This is because students take a largely proscribed curriculum for the 9th and 10th grades, which would apply to either credit scheme.

## **III. ISSUE THREE: Role of Counselors and Principals:**

The staff’s draft rules would create a process for selecting the third science credit and third math credit. The intent of the Legislature may have been to allow student choice, but also to create a process that school districts could implement. E2SSB 6552 provides that:

The rules must also provide that the content of the third credit of mathematics and the content of the third credit of science may be chosen by the student based on

May 6, 2014

Page 4

the student's interests and high school and beyond plan with agreement of the student's parent or guardian or agreement of the school counselor or principal.

E2SSB 6552, Sec. 202(1)(d)(i) (emphasis added).

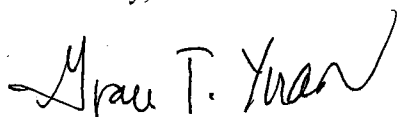
**SBE Staff Interpretation:** The staff draft rule permits a school counselor or a principal to sign off on a science or math course selection, but only if the parent or guardian does not "respond to a request from the school for approval of a specific course." Proposed WAC 180-51-068(2)(a)(iii), Pages 23-24, and Proposed WAC 180-51-068(3), Pages 25-26. These proposed rules change the process currently in place for approving the alternative third math credit, and would simultaneously apply the new process to the new third science credit.

**Alternate Interpretation:** What are the implications of the Legislature's use of the word "or" between parent, guardian, counselor, or principal in E2SSB 6552? Is it an indication that the Legislature intended to allow several different people to sign off on the plan? It is unclear whether the proposed rule would impose an additional administrative burden on districts. As drafted, a school counselor or a principal may sign off on the science or math course selection only if the parent or guardian does not "respond to a request from the school for approval. . . . ." Proposed WAC 180-51-068(2)(a)(iii), Pages 23-24, and Proposed WAC 180-51-068(3), Pages 25-26. This is a new requirement. See WAC 180-51-066(1)(b)(ii) and WAC 180-51-067(2)(b) for alternative language.

If the SBE adopts the proposed rule, what needs to be done to satisfy the new requirement? If records must be created and preserved, this rule would impose more paperwork on school districts. This could create unintended consequences.

If you have any questions, please call me at 206/623-7580. Thank you.

Sincerely,



Grace T. Yuan  
Legal Counsel

June 12, 2014 **Revised**



**Mukilteo**  
School District

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State Board of Education  
PO Box 47206  
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Olympia, WA 98504-7206

Office of Superintendent - Dr. Marci Larsen  
9401 Sharon Drive • Everett WA 98204  
(425) 356-1220 • Fax (425) 356-1310

Re: Draft Rules for 24-Credit High School Diplomas

### **Credit Waiver**

Our District was very supportive of E2SSB 6552 and the goal of establishing more rigorous requirements for high school graduation, including the requirement to complete 24-credits. However, we share the concern expressed by many stakeholders and key lawmakers that raising the bar for earning a high school diploma could have a disproportionate negative impact on students who already struggle to meet the current graduation requirements.

We fully supported the more rigorous requirements because E2SSB 6552 provided what we considered necessary flexibility to ensure that the new requirements would not become another barrier to graduation for poor students, English Language Learners, homeless and Special Education students. We believe that the bill as passed by the Legislature provided adequate flexibility by including the course equivalency language and, most importantly, the ability to make a local determination to waive up to two (2) of the 24 credits for individual students, based on unusual circumstances.

As we read the statutory language and the language in the final Bill Report prepared by Legislative staff, we do not believe that the law as written limits the ability to waive up to two (2) credits to “personal pathway” credits or to elective credits. The Final Bill Report states that “By June 30, 2015, the Washington State School Directors' Association must adopt a model policy for granting individual student waivers of up to two course credits. The policy is to assist school districts in providing students the opportunity to complete graduation requirements without discrimination or disparate impact.” We believe the intent of the Legislature was to allow districts to waive up to two credits, including core credits. The Rules adopted by the State Board should reflect the language as passed by the Legislature.

### **Third Math Credit (Not Applicable to Comments on Draft Rules: Existing rule set to sunset)**

~~E2SSB 6552 states “The rules must also provide that the content of the third credit of mathematics and the content of the third credit of science may be chosen by the student based on the student's interests and high school and beyond plan with agreement of the student's parent or guardian or agreement of the school counselor or principal.”~~

~~The draft rules state that the third year must be Algebra 2 unless the following requirements are met: meets the high school and beyond plan, parents/guardians must agree, a meeting must be held with student and parent/guardian to advise them of requirements for two and four year~~

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~~colleges, and the parents/guardians must sign a form. Since the parent/guardian already has to agree to the fifth year plan, this seems redundant and burdensome.~~

### **HSBP**

We appreciate and support the goal to make the High School and Beyond Plan (HSBP) a meaningful tool for all students and parents by expanding the bare minimum defined in the current rules. The draft language in WAC 180-51-068 (10) would serve districts well as general guidelines and examples, but the requirement that all HSBPs **must include all** the elements in (a) through (d) is overly prescriptive, burdensome and time-consuming.

We are concerned that the requirement in (c) to develop a plan for students in 8<sup>th</sup> grade that includes a four-year high school course plan as well as a personalized pathway is not practical. Instead, we believe it is more reasonable for middle school students to learn more about career opportunities and explore their personal interests. Eighth grade students can then plan their FIRST year of high school courses after completing this exploratory work.

We believe the requirement in (d) *Identification of assessments required to graduate from high school, pursue post-secondary opportunities, and achieve the career or educational goals chosen in the student's high school and beyond plan*, is not really necessary. These goals are broadly met by the elements in (a) through (c).

The highest priority for the use of time in the school day will be to assure that all students have every opportunity to meet the new credit requirements for graduation; staff time will be better spent monitoring student progress and providing interventions to assist students in meeting the credit requirements than on developing highly detailed HSBPs.

Thank you for considering these concerns as you move forward with the development of the final rules.

Sincerely,



Marci L. Larsen, Ed.D.  
Superintendent

C. Board of Directors  
Senator Marko Liias, 21st District  
Rep. Lillian Ortiz-Self, 21st District  
Rep. Mary Helen Roberts, 21st District  
Senator John McCoy, 38th District

Rep. June Robinson, 38th District  
Rep. Mike Sells, 38th District  
Senator Steve Hobbs, 44th District  
Rep. Mike Hope, 44th District  
Rep. Hans Dunshee, 44th District



## Washington State Legislature

To: State Board of Education and Assistant Attorney General Colleen Warren

RE: Intent of E2SSB 6552 Amendments regarding 24 credit waivers

It has come to my attention that the rule proposed by the State Board of Education to implement E2SSB 6552 **only** allows the 7 “non-core” credits to be waived. **This contradicts the specific language of the session law for E2SSB 6552 and the documented legislative intent of this language.**

The intent of the amendments offered successfully to E2SSB 6552 was to **require a waiver to be available for *any* of the 24 credits required for graduation.**

**The session law effective June 12, 2014, now in Chapter 217, 2015 Laws PV, contains clear language that does not limit these waivers to any one type of credit required for graduation in Section 202:**

“(d) (i) The state board of education shall adopt rules to implement the career and college ready graduation requirement proposal adopted under board resolution on November 10, 2010, and revised on January 9, 2014, to take effect beginning with the graduating class of 2019 or as otherwise provided in this subsection (1) (d). **The rules must include authorization for a school district to waive up to two credits for individual students based on unusual circumstances and in accordance with written policies that must be adopted by each board of directors of a school district that grants diplomas. ...**”

The Legislature knew how to, if it desired, limit the waivers to elective or non-core credits. The Legislature very deliberately did not limit the waiver to non-core, because the intent of the language was to direct the State Board of Education to adopt rules which “must include” authorization for waiver of any two credits based on a student’s unusual circumstances.

The intent of this language is documented with the proposed and adopted amendments shown in the bill history for E2SSB 6552, and with Email correspondence with Office of Program Research staff on 2/24/14.

Draft language was for an amendment to Section 202 of E2SSB 6552, to ask that the State Board of Education adopt rules “**which include[d] authorization for a school district to waive up to two credits on an individual student basis in accordance with the rules established by the State Board of Education**”. This language has remained, and its effect was stated in my amendment, MCLA 978 introduced in the House Education Committee on 2/26/14.

These waivers would be to accommodate students who faced barriers to finishing school due to “medical condition, homeless status, or disability documented through an Individual Education Plan under Sec. 504 ...”

Below is a section of the draft amendment language which specifically addresses these points in E2SSB 6552, H AMD to H AMD (H-4469.1/14), which I introduced in the House Education Committee as an amendment to SB 6552 (6552-S2.E AMH ED MCLA 978) The intent was to ensure that students could **waive up to four credits from the total number of credits required for graduation, and did not specify what area of study they would be from:**

"NEW SECTION. Sec. 203. ... (1) The school district must provide a waiver of required credits based on criteria that take into account the unique limitations of a student to complete the required credits, which must include but not be limited to limitations associated with homelessness; poverty; limited English proficiency; medical conditions that impair a student's opportunity to learn; or disabilities, regardless of whether the student has an individualized education program or a plan under section 504 of the federal rehabilitation act of 1973.

(2) The school district must provide for a waiver of up to **four credits from the total number of credits required for graduation** if the student has not been provided with an opportunity to retake classes or enroll in remedial classes free of charge during the first four years of high school."



## **Transcript of Public Comment - E2SSB Public Forum June 6, 2014 – Old Capitol Building**

### **Teacher and Student Group from Kent-Meridian Technology Academy**

#### **Lexi Samorano, Teacher, Kent-Meridian Technology Academy**

I am the teacher of these fabulous students. I'm from Meridian Technology Academy. We were asked to come by the Board of Education group to talk about parent involvement in all of these schools as you think about making changes, our take on how parents should have a little more say in these rules. [Inaudible]

I am with my kids for 180 hours. Parents are with the kids a lot more, ten times as many. Parents I don't think have the say that they need to have on a consistent basis, particularly at the middle and high school level, especially with the High School and Beyond Plan, with decisions to hold children back or not at the middle school level. There is a lot of research around that. But, many parents have expressed a little bit of discontent with not having more say around how their students are meeting these graduation requirements, especially after becoming more rigorous, which I totally agree with. I think parents need to be more involved in what classes their students are taking, when they are going to retake things, how high they are going to go, what kind of challenging classes they are going to take, and that sort of a thing. Also, parents need to be educated a lot more on the requirements. We educate our students quite a bit, but our parents aren't in our classes. We try to send flyers, we try to send things electronically to them. I think there needs to be new ideas and new innovative ideas that give the word out and exactly what the kids are doing eight hours of the day. And, how they are going to get through this system of school, particularly in my school where there are more migrant parents from other countries who don't understand the American system. It is very much lot different from other systems, particularly for countries that do not have a formal education system. They don't understand any of it. They are expecting their children to get all of the information for them. So, there has to be a better way to get information from the state-level and the district-level into the parents' hands. I want to end there and continue on with my students.

#### **Samii Hsu, Student, Kent-Meridian Technology Academy**

I was going to high school in [Inaudible] before enrolling in the Technology Academy. [Inaudible] We have over 70 languages at my school. My parents are very involved in my academic career. [Inaudible] I had an older brother who already went through high school. Many parents of the students are refugees, not English speakers, or do not live in the US at all. They don't know much about the system. They have a hard time getting involved in the system because we do not have ways to communicate with them or build a relationship to get them comfortable with getting involved in the school and their students' lives. We identified a problem in the community and tried to determine a solution. We identified the low graduation rate and how parental involvement can affect that. [Cited graduation statistics from the Kent school district and offered contextual information on Kent schools.] We believe that parent involvement is very important for student success. For instance, there is a report on the National

Education Association website that states that, regardless of family income or background, students who have parents involved in their academic careers will more likely earn high grades, pass their classes, attend school more regularly, have better social skills and good behavior, and graduate. Parental support systems helps them to get involved by overcoming language barriers, cultural differences, and lack of relationship between teachers and staff at school.

**Maggie Haggerty, Student, Kent-Meridian Technology Academy**

[Inaudible] – My parents want to be more involved, but they can't always be involved because they both work full time jobs and, the second they get home, take care of my two toddler sisters. So, it is pretty hard for them to be involved in my school. [Inaudible]

**Starr Lowe, Student, Kent-Meridian Technology Academy**

I am also a 10<sup>th</sup> grader at Kent-Meridian High School in the Technology Academy. Before I moved to Washington, I was in Minnesota. The grading system was different there. And so when I moved to Washington, it was hard for me to stay on track. Back in Minnesota, I was there for my freshman year of high school. It was hard for me to through the transfer process because my mom wasn't as involved. For me, I need the extra support and that push to be more involved in school. So, without having that – [Inaudible] there was no one really there so I slacked off a bit. [Inaudible] Migrant students need extra support to keep them involved. I think other students the extra support. It helped me and I didn't realize how effective the extra support is and how important parental involvement in school is. Parent and guardian support is incredibly important for student success.

**Shelby Cornish, Student, Kent-Meridian Technology Academy**

I am also a student at Kent-Meridian High School. [Inaudible] I was not used to the grading and school system. My parents would make sure I worked hard in school while I was having difficulty. Children and teenagers need adult support to keep on going. [Inaudible]

**Ashley Guerra, Student, Kent-Meridian Technology Academy**

I am also a student at Kent-Meridian High School, but I'm actually a freshman. I am representing my group who, sadly, could not attend this event. We already proposed a solution for the issue of parental involvement and we believe that we need it in our society. There is this program called the P.A.S.A. program. P.A.S.A. and that stands for Parent Academy for Student Achievement. It is a nine-week program that improves parent involvement and provides information about the school. Like we talked about earlier, there are work, transportation, and language barriers. Many parents cannot go to this program because it a nine-week program and you have to drive there yourself. You have to attend all nine weeks in order to get credit. If both parents, if all parents were able to attend this event then the society would have much better parental involvement and it would make such a better impact on campus society. But, that is difficult because we are so diverse and there are people speaking so many languages and people working two jobs. There are many different reasons why people do not attend this event. So, our solution, we propose the P.A.S.A. app to improve parent involvement. A lot of you have tablets, iPhones, iPods, or something where you can get an application. When I presented my solution, many people stated that they had SnapChat, Instagram, and all of these are not educational and don't really make much of a benefit for society. But, if we create this P.A.S.A. app, it is the exact same thing as the P.A.S.A. program, but would allow for these parents who don't speak English or don't have time



to go to an actual program to to use mobile device application. It would allow them to participate, it would be free, and learn about what your child is learning in school so that you can come and help. I am blessed because my parents are involved. A lot of my friends' parents are like "what are you doing in school," but they can't really help them because they either won't speak English or are working jobs. That is why we proposed this P.A.S.A. program as an app instead.

**Jerry Bender, Director of Governmental Relations, Association of Washington School Principals**

Good afternoon, I am Jerry Bender with the Association of Washington School Principals. Thanks State Board for including us in the discussion. We appreciate the work that has been done and glad to have been a part of it. There is still one area of concern for us and it deals with the agreement between students, parents, and guardians for a school around the third math credit. That is in section 202 of the law. And, the proposed rule says with agreement of the student's parent or guardian or, if the parent or guardian is unavailable and do not respond to the request from the school for approval of a specific course agreement, of the school counselor or principal. The issue that would be helpful to get resolved is when there is a dispute between what that third math or science credit should be, who has the ultimate card. If the student chooses, then the parents could feel shut out of the process if there is a difference in opinion between the student and the parent. If the parent chooses, then, ultimately, between the two, again if there is a dispute, then the involvement of the parent will feel slighted. And, in the same vein, if the student is going to choose then you probably don't need the involvement of the principal or the counselor. So, the hiccup attached to it is, and the law says, the parent or the student, but it is silent if there is a disagreement between the two. So, that issue needs to be resolved before it gets to the building level. I would be glad to work with State Board of Education staff to resolve that one. But that is one that has popped up on our radar screen. With that, if there are any questions I will take questions.

Mr. Ben Rarick: Do you have a proposed solution for this?

Mr. Jerry Bender: I have some ideas for solutions that I will work with the Jack on and he and I have visited some.

**Representative Sam Hunt, 22<sup>nd</sup> Legislative District**

Thank you for the opportunity. I don't know if we will be able to make it to Spokane in July but we can certainly put our oar in the water on this one. I want to start out with a little background on 6552 from a legislative standpoint and how we got to where we are today. For those of you who don't watch TV-W every day, hour-by-hour, which is probably most of you I hope. This bill passed in the very waning days of this year's session and we were at a stage where we didn't think we were going to get a bill. There was so much disagreement over what should be in it. Not only the 1080 hours, but the 24 credits, some of the parental involvement, dealing with kids with different abilities, waivers, and when do we implement this and all that.

We had a list of amendments in the House. I think there were 14 amendments. We had a democratic caucus that was probably the longest caucus on any individual bill this year. I think it exceeded two hours and, you know, we went through point-by-point. Finally, one of the

members stood up and said “You know I love you all, but I’m not the education guy in the room, I could vote for all of these, I could vote for none of these, I don’t know what to do” so we took a break and did a little vote count. At the same time, the speaker of the House Frank Chopp called a couple of us into the office, I guess you could call it the principal’s office, and said “can you work tonight? This is about 4 o’clock in the afternoon and said “Can you work tonight and come up with something that we could get 50 votes for tomorrow?” And, we sort of froze in our tracks and got the deer in the headlight look, because to take something like this and turn this around in 12 hours. But, Representative Reykdal and I and several others and some staff got together and went through the amendments. We crafted one amendment to the bill that took what we thought were the key points from the 14 amendments and we put that into the bill. Then, it was up to us as members also to not only get our members but we wanted bipartisan support. We had to talk to the Republican members of the House. It would be great if it got 98 votes in the House; that would be wonderful. But, if it didn’t pass the Senate then it still wouldn’t be anywhere. So we had to go talk to the House and get the support from the House and the various education groups, the lobby groups, the parent groups, the various other groups that were deeply involved in this bill. Oddly enough, in this 12 hour period, turned out to be more like a 24 hour period, we came together on this amendment and this bill passed. It went to the Senate and passed with an overwhelming vote. We got strong bipartisan vote from the House and the Senate and sent the bill to the Governor and he signed it. It looked easy at the time but it wasn’t and there were a lot of tipping points in this and that’s what we’re concerned about. There are several things that we want to make sure are clarified as the State Board goes through and looks at this process and does the implementation. I think it is an important point and it wasn’t easy and it wasn’t a foregone conclusion. When we put our amendment out on the house floor, we were told that there was no way the Senate would like that. And, the Senate leaders who were involved in this looked at it and said “yeah, we think we can go with this.” Several of the groups and the Governor’s office... you know we didn’t know how the Governor was going to feel. When we talked to the Governor’s staff, with Marcie and others, we sort of agreed that... You have to realize, in the legislative arena, there is never a perfect bill, and there are things. We may have to come back and look at things in this, certainly in education as we go through the education formal query, we will have to keep looking and be finding and modifying. I just want to point out that this was a very tough decision. It was something that came together almost miraculously but it was not easy. So, with that in mind, Representative Reykdal has a few points about the bill itself that a group of us legislators have been working on who were on the education and higher education committees have been looking at.

### **Representative Chris Reykdal, 22<sup>nd</sup> Legislative District**

I’m state representative Reykdal, for the record, Legislator, House member from the 22<sup>nd</sup> district here in Olympia. To feed off of what Sam said, I want to be really clear about three points that have come to our attention as things that folks may not have a consistent understanding of or may question the legislative intent around. I want to be very candid where we clearly had conversation and made an explicit judgment about something or where we just didn’t have the conversation and, thus, probably why it is wide open and is subject to interpretation and, maybe, some recommendations moving forward.

First, I think the most significant issue is the two-credit waiver. We clearly did not have the votes for this legislation until both sides got together. One of my roles was to be liaison to the House

Republican Caucus. I think very consistently their priority was local control and flexibility for students. Those were two things that they consistently brought forward. Representative David Taylor was the primary spokesperson for them in this conversation at the end. The bill does not say that we should limit the two credits to the last seven – the seven flexible credits. It says two credits. It is pretty clear. This where I want to be very candid with you and say that some of us are quite nervous that this would allow for an individualized education plan for a student that would say “I want to take Algebra I during my freshmen year then never take another math class.” That is not what anyone intended. So, the language that was put in there was “unusual circumstances.” Here is your legislative lesson of the day. That words mean nothing once you pass a bill. Everyone has a different interpretation of what that means. I think our intent is to suggest to you that had we been very intentional about this then we would have kept the two credits flexible on all 24, not just seven of the credits. We would have really clarified what those two words mean so that it was not a green light for students to sign up for one math class in high school. The intent is to get students to take more math and more science - three credits of math and three credits of science or more. But there truly are unusual circumstances where students need to opt out of that. So, we just leave with that idea that. We also share some nervousness that State Board of Education staff share that this path is less rigorous. That is not the intent. It should be more rigorous with some flexibility.

Second, with respect to clarifying the intent on parents. Parents work with students. The presumption today as a school counselor is that you work out that semester course schedule with a student and that course information gets entered into the system and there is a presumption that the student will work on that with their parents. I think we wanted to make that a stronger connection. Our druthers to you is that we think you are on the right track here to emphasize that the student and parent come first, and the counselor and principal are in the backseat of that relationship. So, we would suggest that you are on the right track there. We don't have answers, we didn't discuss explicitly what would happen in the conflict between a student and a parent. Those conflicts happen today; it moves forward. Those conflicts are really something up to the home to figure out. The other thing that we really didn't clarify is, does this imply an added administrative burden where we now need 50 or 60,000 sheets of paper go home to get sign to say “yes, I affirmatively agree with the schedule that my student is contemplating here.” We didn't cover that. This is one of those things that I want to be candid on. We didn't have discussion on whether there should be more documentation or less.

The third issue is with respect to the High School and Beyond Plan. When I wear my other hats as college administrator and board member on a private education foundation. I can tell you that I put a decade into this concept of high school and beyond planning. Everything that the State Board of Education is learning and developing is right on track. These things don't work unless they begin in the 7<sup>th</sup> or 8<sup>th</sup> grade or even earlier. That said, we had a discussion among a group of people who wrote the striking amendment and this was one of those areas where we just did not get to in any detail. We agree with the policy construct that this has to happen early but the legislative language is extremely clear in this case. It says that local districts make that determination. So, our recommendation to the Board is that you do not write a rule that prescribes 7<sup>th</sup> through 8<sup>th</sup> grade. Even though the policy is in the right direction, it would clearly get in front of the legislation and create a conflict. We are already talking about coming back next year and clarifying - with lots of research –the need for a 7<sup>th</sup> and 8<sup>th</sup> grade High School and

Beyond Plan timeline and the clarification on point number one about unusual circumstances. We know that we owe you a little bit more work, but it would be premature to go with 7<sup>th</sup> and 8<sup>th</sup> grade this year in our opinion with the absence of that work on our part. I will pause if staff or anyone else has any questions.

Mr. Jack Archer: I do have a question, Representative Reykdal. Is it your opinion that the proposed language on the agreement of et cetera et cetera in regards to the third math course or third science course is consistent with the legislative intent? That has been a little bit challenging.

Representative Chris Reykdal: Yeah, commas matter, we probably didn't put the commas in the right place on all of the "or"s. But, based on conversations and subsequent conversations, again the folks who wrote the final striking amendment. Juxtaposed against your proposed rule, we think you are on the right track here. You are putting the parent in the first position with the student, you are putting the counselor or principal in the second position. I suppose there are lots of snarls when a parent is not involved in a child's life and somebody else is going to have to sign off on that form, which historically has been a school counselor.

Mr. Jack Archer: That is the intent. It has not just been our intent, but it has been what we have discerned to be the intent of the Legislature based on the placement of the "or"s and the combination of the nouns.

Representative Sam Hunt: I want to add just one quick thing. As I said, we worked on this bill all session but this final amendment came together in a rush. And I think that is part of the reason why we have all of these "or"s strung in there. [Inaudible] But, the other thing that we did because we didn't understand - unusual circumstance is hard to define. So, we directed the Washington State School Director's Agency, it is the association that represents school boards and school board members, it is a state agency, we directed that agency to develop a model policy that school district boards of directors can use when they implement the waiver process. Hopefully, and they have done this a lot before, I have faith that we can work with them and work with the State Board and we will get to a good point there. There is that intervening where the State Board of Education and the School Directors' Association can work together and work with school districts to try to put some fences around unusual circumstances and the whole process for waiver.

Mr. Jack Archer: Just to clarify on the High School and Beyond Plan, your belief, your view, is that the components, the elements of the High School and Beyond Plan, those rules go further than legislative intent, and prefer not to have the elaboration in rule.

Mr. Ben Rarick: There are two issues here: one is the components and the other is the specific issue that you raised with 7<sup>th</sup> and 8<sup>th</sup> grade. Now, I will say that in the discussion with the Board, it became pretty apparent that there actually is no way to do a High School and Beyond Plan if you don't start in 8<sup>th</sup> grade because the students are choosing what they will take during 9<sup>th</sup> grade during 8<sup>th</sup> grade. So we felt like we are stating what is. But by stating what is and by raising the profile of the 8<sup>th</sup> grade starting point, Perhaps more than just the selection of courses would happen in 8<sup>th</sup> grade, but also that full-blown planning would occur in 8<sup>th</sup> grade. But, if that is

counter to your intent, we would certainly want to know that. But the clarity that I am seeking here is that there is a difference between these components versus the 8<sup>th</sup> grade issue.

Mr. Chris Reykdal: The components are excellent. Even the thrust for 7<sup>th</sup> and 8<sup>th</sup> grade initiation of the plan is right-on from a policy standpoint and that is where I am trying to be very clear with you. What we don't want to do is get too rigid in rule today in the absence of law. The law is very clear here and it says it is up to local districts. In that case, you don't get a lot of flexibility, right? What we need it to say "subject to the rules of the State Board." We didn't say that, we probably should have said that here but we didn't. So, I think the better pathway here is to put the core elements in, then, in partnership with OSPI, State Board of Education, and some other policy experts, send out supplemental material that says "folks, this is the way this works best – from every expert around the country, this is what works best here, we go in 7<sup>th</sup> and 8<sup>th</sup> grade, and these are the elements, these are the components" but I would just hesitate to put in rule the number seven or number eight because I do think it creates a conflict with the law.

Mr. Ben Rarick: Thank you for the clarification.

Representative Sam Hunt: You can request it next year... or we can just work on it next year.

Mr. Ben Rarick: That is actually a hugely important clarification. So, we will not take out these components but the Board will consider striking the reference to 8<sup>th</sup> grade.

Representative Sam Hunt: Anything else?

Mr. Ben Rarick: I want to thank you gentlemen for taking the time and thanks for all the work you've done.

## **Comments on Proposed SBE Rules to E2SSB 6552**

Prepared by Wendy Rader-Konofalski, Washington Education Association

June 6, 2014

WEA has identified four sections of concern--three sections where we feel the SBE has stepped over the bounds of its authority and proposed rules that exceed the scope and intent of SB 6552 and one section which we feel needs a simple amendment. Those areas are:

1. The authority for school districts to waive up to two credits of the 24-credit framework for individual students under "unusual circumstances"
2. Mandating High School and Beyond Plans to begin in middle school
3. Adding extra requirements to the district waiver of the 24 credit framework
4. Laboratory Science definition

### **1. The authority for school districts to waive up to two credits for individual students of the 24-credit framework under "unusual circumstances"**

Request: We request removal of the stipulation that the two credit waiver does not apply to the so-called "seventeen core required credits."

Rationale: The statute specifically gives school districts the authority "to waive up to two credits for individual students based on unusual circumstances and in accordance with written policies that must be adopted by each board of directors of a school district that grants diplomas. It also specifically requires WSSDA to adopt a model policy on this specific subject and gives them until June 30, 2015 to accomplish this task.

We would argue that this addition is not consistent with the spirit or intent of the amendment passed at the end of session which allowed this bill to be passed off the House floor. Legislators we have spoken to are clear that they did not intend any particular credits to be off limits to the two credit waiver. It limits local flexibility and it undermines the legislative requirement for WSSDA to create its model policy without a restriction on its charge. If the SBE promulgates rules one year in advance of the model policy requirement for WSSDA which isn't until June 2015, this appears to be an end run on the process as outlined in statute.

### **2. The timing of the High School and Beyond Plan**

Request: WEA requests removing the mandate to move HSBPs development into the middle school.

Rationale: Section 202 (1)(c) in E2SSB 6552 stipulates that "Any decision on whether a student has met the state board's high school graduation requirements for a high school and beyond plan shall remain at the local level."



Yet SBE proposed rule (WAC 180-51-068) puts into place a requirement that “high school and beyond plan “must include... a four year plan for course-taking created in middle school grades.” (10)(c)

While there might be merit to starting work on the HSBP in middle school, the fact is that that is not a requirement at this time. Including HSBP as a requirement in middle school would, in fact, be an entirely new policy which has not been vetted through the legislative process and remains entirely outside of the scope and authority of the SBE to mandate in rules.

Before any decisions about moving HSBPs into middle school, policy discussions with stakeholders to consider workload implications, funding and staffing needs, including especially counseling staffing at the middle school level would have to take place through the legislative process—not SBE rulemaking. RCW 28A.305.135 requiring the SBE to conduct a school district fiscal impact statement for any significant rule changes would apply.

### **3. Extra requirements for district waiver of 24 credit framework**

Request: Remove language that requires a school district resolution to accompany a waiver application.

Rationale: According to section 202 (1)(ii), districts wishing to waive the 24 credit framework for up to two years can apply by describing “why the waiver is being requested, the specific impediments preventing timely implementation, and efforts that will be taken to achieve implementation with the graduating class proposed under the waiver. The SBE shall grant a waiver under this subsection (1)(d) to an applying school district at the next subsequent meeting of the board after receiving an application.

In SBE’s proposed rules, WAC 185-51-068 (11)(a)(ii), an additional requirement is mandated that the application “Be accompanied by a resolution adopted by the district board of directors requesting the waiver under this section. The resolution shall state the entering freshman class or classes for whom the waiver is requested, and be signed by the board chair or president and district superintendent.”

This may be a good idea, and in fact it may be something that districts will want to do. However, it is a mandate and adds a step to the waiver process that the statute does not require. Since the legislature very intentionally made this a waiver that should be easy and quickly expedited by the SBE without any options for denying the request, such a requirement is not warranted and continues a pattern of the SBE overstepping their authority and the bounds of statute in their rule-making process.

#### 4. Laboratory Science definition

Request: Add to the NSTA definition of lab science, the NSTA definition of “Support for Science Labs”

Rationale: SB 6552 does not contain a definition for Lab science. The new 24 credit framework requires that all students take three credits of science, two of which must be in laboratory science.

SBE proposed rules, WAC 180-51-068 (14)9a) defines laboratory science as “any instruction that provides opportunities for students to interact directly with the material world, or with data drawn from the material world, using the tools, data collection techniques, models and theories of science. A laboratory science course meeting the requirement of this section may include courses conducted in classroom facilities specially designed for laboratory science, or coursework in traditional classrooms, outdoor spaces, or other settings which accommodate elements of laboratory science as identified in this subsection.

We think this definition might be a good idea as it provides flexibility for schools and teachers in the delivery of lab science courses. However, insofar as it also might impinge negatively on a district’s funding requests or needs for traditional lab classrooms, we would suggest an addition to this definition. It appears that the definition SBE has used here comes from the National Science Teachers Association. That being the case, there is another part to the NSTA definition which would clarify the issue and we suggest all of salient portions of it be included in the SBE proposed rules definition of lab science:

#### Support for Science Labs

To ensure that laboratory investigations are implemented in schools, administrative support is crucial. NSTA recommends that the school administration recognize the instructional importance, overarching goals, and essential activities of laboratory investigations and provide the following:

- An adequate facility where labs can be conducted. At the preschool and elementary levels, this means a classroom with sufficient work space, including flat moveable desks or tables and chairs, equipment, and access to water and electricity. At the middle and high school levels, a safe, well-equipped lab space should be available, with necessary equipment and access to water and electricity. In addition, appropriate facilities to work with students with special needs should be provided. (Beihle 1999)
- Adequate storage space for all materials, including devices and materials in common use that are considered hazardous. (Beihle 1999)
- Funding for yearly educator training on how to manage materials and guide inquiry-based learning during labs.



- A budget for regular maintenance of facilities and equipment, as well as annual costs for new or replacement equipment, supplies, and proper waste management.
- A budget that recognizes additional costs required for field experiences.
- Laboratory occupancy load limits (number of occupants allowed in the laboratory) set at a safe level based on building and fire safety codes, size and design of the laboratory teaching facility, chemical/physical/biological hazards, and the needs of the students (Roy 2006; NSTA 2000). Science classes should have no more than 24 students even if the occupancy load limit might accommodate more. (NSTA 2004) Research data shows that accidents rise dramatically as class enrollments exceed this level. (West 2001) Teachers should not be faced with a Hobson's choice—teach in an unsafe environment or sacrifice the quality of teaching by not doing labs.

## Webinar: Forum on Rules to Implement E2SSB 6552

June 6, 2014

### Questions/Comments by Online Attendees

#### **Mary Beth Tack asked/commented:**

- Give a couple of examples of "extenuating circumstances" for the 2 credit waiver
- Currently we have the Washington State Diploma (20 credits).....is this option completely removed. The only option is the 24 credit with the unusual/rare option of 24 (with 2 waived)?! Is that correct.....can you specifically talk about this.
- Will additional continued \$\$ be directed to the implementation of 24 credit requirement from McCleary above and beyond - consistently each year
- Clarification: There is contradiction. In the SBE paperwork the 2 credits that can be waived can be on ONLY Arts and/or World (based on PPR).....I believe the individual that just spoke said it was only on Math & Science. Clarify.

#### **Jim Kowalkowski asked/commented:**

- This is Jim Kowalkowski from Davenport. I wanted to thank the two legislators for their testimony and their insight. The 2 credit waiver flexibility will be used wisely and carefully by districts. Thank you for trusting our public schools---this is a message we do not always hear.
- I do have just a couple of comments and a couple of questions. The proposed wording to WAC 180-16-200 looks very good and I appreciate the language stating that a district-wide annual average of one thousand twenty-seven instructional hours in grades 1 through 12 will meet the requirement. My question regarding this is the five-day waiver for seniors...can we still count these 5 days as instructional time and is it addressed already in a WAC?
- This is Jim from Davenport again, my other comment and question is regarding the amended proposed language for WAC 180-51-067. The language regarding a required culminating projects is stricken...why not amend this with, "Depending on local school board policy"...and keep the language. For many districts, the Culminating Project is a great thing and the WAC could clearly state that this is a local decision. Thank you!
- Thanks for letting folks participate in this webinar. It is very much appreciated. We have our graduation ceremony tomorrow and there is no way I can miss that! Thanks again.

#### **Grace Yuan asked/commented:**

- This is Grace Yuan. I am commenting on behalf of the School Alliance. I would like to thank Representative Hunt and Representative Reykdal for the comments that they provided this afternoon. Their statements outline the legislative intent to allow the two-credit waiver to apply to all 24 credits. We endorse this approach and support the local decision making process by elected school board members. We look forward to working with the State Board on amendments to this proposed rule. Thank you.