



p 206-623-0180

f 206-447-0502

520 Pike Street, Suite 1212
Seattle, WA 98101-4001

www.waroundtable.com

October 14, 2019

Washington State Board of Education
c/o Randy Spaulding, Executive Director
600 Washington Street
Olympia, WA 98504

Dear State Board of Education members and staff,

RE: Draft Rules for Graduation Pathways Option – CTE Pathway

I am writing to further articulate the concerns of the Washington Roundtable with regard to the board's draft rules for Graduation Pathway Options (following legislative adoption of House Bill 1599) and to recommend changes prior to final approval. The concerns in this letter are in addition to those outlined in a letter we sent in partnership with other organizations on September 6, 2019.

The Washington Roundtable again urges the board to reconsider proposed language regarding the career and technical education (CTE) graduation pathway. The proposed rule would permit students taking any two CTE credits to qualify for this graduation pathway, allowing for a mix and match of CTE courses from across different program areas (proposed rules WAC 180-51-230 (5)(h)). This means a student could combine a credit in cosmetology with a credit in manufacturing. That student would be able to "check the box" for graduation, but they would not be prepared for work or postsecondary education or training in a related career field. The draft rules do not reflect the intent of the statute.

The clear intent of the statute is to enable students to "complete a sequence of career and technical education courses that are relevant to a student's postsecondary pathway, including those leading to workforce entry, state or nationally approved apprenticeships, or postsecondary education." The statute further defines that coursework as a "sequenced progression of multiple courses that are technically intensive and rigorous." (RCW 28A.700.030)

Allowing for the mix and match of CTE courses in order to meet minimum graduation requirements will not ensure a level of preparation sufficient for students to move on to work or postsecondary education and training. To the contrary, if enacted the draft rules will compromise the ability of schools and districts to deliver meaningful CTE pathways that provide access to aligned employment and postsecondary education or training. This will undermine efforts to raise the credential attainment rate among Washington students to 70 percent by the high school class of 2030 (we're only at 40 percent today). It will position Washington as one of the least rigorous states when it comes to CTE education requirements. We have significant concerns that creating this low bar for CTE Graduation Pathways will exacerbate, not solve, inequities for students as we have seen time and time again that the least rigorous pathway becomes the default pathway.



I urge you to amend the draft rules to more specifically mirror the language in the bill and the reference to RCW 28A.700.030; eliminate the language permitting mix and matching CTE courses; and require that CTE courses be a sequenced progression that meet the minimum criteria of CTE preparatory courses/programs, or the curriculum requirements of specified Core Plus programs, in order to meet the graduation requirement.

If you have questions, please feel free to contact me or Brian Jeffries, policy director for Washington Roundtable and Partnership for Learning, brian@partnership4learning.org / 206-623-0180.

Sincerely,

A handwritten signature in black ink that reads 'Steve Mullin'. The signature is written in a cursive style with a large, stylized 'S' and 'M'.

Steve Mullin
President



ASSOCIATED GENERAL CONTRACTORS of WASHINGTON

Skill · Integrity · Responsibility

October 16, 2019

Mr. Randy Spaulding, Executive Director
Washington State Board of Education
PO Box 47206
600 Washington Street
Olympia, WA 98504-7206

Dear Mr. Spaulding and Board members,

The Associated General Contractors of Washington (AGC) and the AGC Education Foundation urge the State Board of Education to reconsider its proposed language regarding the career and technical education (CTE) graduation pathway. We believe the proposed rules do not reflect the intent of the legislation that was passed (E2SHB 1599).

The proposed rule would permit any two credits of CTE to qualify for this graduation pathway, allowing for a mix and match of CTE courses from across different CTE program areas (proposed rules WAC 180-51-230 (5)(h)). What this means is a student could combine a credit in cosmetology with a credit in welding to meet the requirement of this graduation pathway. This approach would not prepare a student to enter the workforce, a postsecondary education or training in a related career field.

The clear intent of the statute is for students to “complete a sequence of career and technical education courses that are relevant to a student’s postsecondary pathway including those leading to the workforce entry, state or nationally approved apprenticeship programs, or postsecondary education...” (RCW 28A.700.030). A mix and match approach for CTE courses undermines having meaningful CTE pathways which will provide real access for students to gain employment and/or training post high school in a related field. Completing a credit of cosmetology and a credit of welding may “check the box” for graduation, but it does not prepare a student for post high school success.

Having such a low bar for a CTE pathway undermines the true value of a strong CTE program and would make Washington State one of the least rigorous states when it comes to CTE education. The proposed rule, as currently drafted, will negatively impact the work being done through Career Connect Washington, the Work Integrated Learning Advisory Committee (WILAC), and public-private programming across the state preparing students for career pathways that are meaningful and meet the needs of Washington’s economy.

We urge that you amend your draft rules to more specifically mirror the language in the bill and the reference to RCW 28A.700.030, eliminate the language permitting mix and matching CTE courses, and requiring the CTE courses to be a sequenced progression.

Thank you for your consideration.

Sincerely,

Michele Willms

Corporate | Seattle District

1200 Westlake Avenue N
Suite 301
Seattle WA 98109
T 206.284.0061
F 206.285.4546

Legislative

410 11th Avenue SE
Suite 203
Olympia WA 98501
T 360.352.5000
F 360.352.4411

Central District

6 South Second Street
Suite 910
Yakima WA 98901
T 509.454.5064
F 509.452.6503

Southern District

3601 20th Street East
Fife WA 98424
T 253.896.0033
F 253.896.0036

Northern District

119 N. Commercial Avenue
Suite 110
Bellingham WA 98225
T 360.223.8757

Education Foundation

1200 Westlake Avenue N
Suite 301
Seattle WA 98109
T 206.284.4500
F 206.284.4595

Dear State Board of Education members and staff,

We strongly request your organization's reconsideration of the SBE proposed language regarding the career and technical education (CTE) graduation pathway. We believe the proposed rules do not reflect the intention of the statute, will weaken Washington's investments in meaningful CTE programming, and will exacerbate inequalities in our education system.

The proposed rule would permit **any two credits of CTE** to qualify for this graduation pathway, allowing for a mix and match of CTE courses from across different CTE program areas (proposed rules WAC 180-51-230 (5)(h)). This means a student could combine a credit in cosmetology with a credit in welding and meet the requirement of this graduation pathway.

OSPI believes this is potentially in conflict with the intent of the legislation, which is to provide access to postsecondary training and education, careers, or apprenticeship through a "**sequenced progression** of multiple courses that are technically intensive and rigorous" (RCW 28A.700.030). While the flexibility proposed in the SBE rules may provide "flexibility" to students in regard to graduation and their High School and Beyond Plan (HSBP), it is not aligned with CTE program guidance and accountability and will create inconsistency and conflict with our CTE program.

A mix and match approach undermines having meaningful CTE pathways which provide real access for students to employment and/or training after high school in a related field. Completing a credit of cosmetology and a credit of welding may "check the box" for graduation, but it does not prepare a student for post-secondary success and undermines our state-side efforts in CTE.

Having such a low bar for a CTE pathway undermines the true value of a strong CTE program and would make Washington state one of the least rigorous states when it comes to CTE education, not a national leader. The proposed rule will negatively impact the work being done through Career Connect Washington, the Work Integrated Learning Advisory Committee (WILAC), and public-private programming across the state preparing students for career pathways that are meaningful and meet the needs of Washington's economy.

We are significantly concerned that creating this low bar for CTE Graduation Pathways will exacerbate, not solve, inequities for students of color, students with disabilities and students from low-income communities. We have seen time and again the least rigorous, least powerful pathways become the default for many of these students, and see no reason why it would be different this time around.

We request you amend your draft rules to more specifically mirror the language in the bill and the reference to RCW 28A.700.030, eliminating the language permitting mix and matching CTE courses, and requiring the CTE courses to be a sequenced progression. We have attached amendatory language for this section of the proposed rules which would accomplish this goal.

Sincerely,



Kelsey Moulton
Timberline High School
Business & Marketing Educator
FBLA Capital Regional Adviser

Proposed Rule WAC 180-51-230

h) **Career and technical education course sequence.** Complete a sequence of career and technical education courses.

(i) For this subsection, "sequence" is defined as: Two or more high school credits of career and technical education courses in a **sequenced** progression tailored to the student's goals and relevant to the postsecondary pathway(s) outlined in the student's high school and beyond plan. A student's sequence of career and technical education courses to satisfy this pathway (~~may~~) **must** be comprised of courses within the same career and technical education program area ~~or courses within more than one career and technical education program area, as determined relevant by the student's high school and beyond plan in consultation with school personnel.~~ A student's career and technical education course sequence (~~may~~) **must** include courses leading to workforce entry, state or nationally approved apprenticeships, or postsecondary education.

(ii) Satisfying this pathway does not require a student to take any courses that are part of a career and technical education preparatory program as described in RCW [28A.700.030](#).

(iii) Each sequence of career and technical education courses must include at least one course that meets the requirements in (h)(i)(A) or (B) of this subsection:

(A) The minimum criteria identified in RCW [28A.700.030](#):

(I) Either:

- Lead to a certificate or credential that is state or nationally recognized by trades, industries, or other professional associations as necessary for employment or advancement in that field; or

- Allow students to earn dual credit for high school and college through tech prep, advanced placement, or other agreements or programs;

(II) Be comprised of a sequenced progression of multiple courses that are technically intensive and rigorous; and

(III) Lead to workforce entry, state or nationally approved apprenticeships, or postsecondary education in a related field.

(B) The curriculum requirements of core plus programs for aerospace, maritime, health care, information technology, or construction and manufacturing.

(iv) Satisfying this pathway does not require students to meet the separate English and mathematics graduation pathway requirements of pathway options (a) through (f) of this subsection.

(v) A course that is used to meet graduation pathway requirements may also be used to meet credit subject area requirements, including career and technical education course equivalencies per RCW [28A.700.070](#).

October 18, 2019

Dear State Board of Education members and staff:

I strongly request reconsideration of the SBE proposed language regarding the career and technical education (CTE) graduation pathway. I believe the proposed rules do not reflect the intention of the statute, weakens Washington's investments in meaningful CTE programming, and exacerbates inequalities in our education system. For far too long vocational education was seen as a less than for students, the current proposed rules returns CTE to those days. With all the work in our state to leverage CTE for all students to become successful contributing members of society, the economy and life, this will be a serious step back!

The proposed rules permit **any two credits of CTE** to qualify for this graduation pathway, allowing for a mix and match of CTE courses from across different CTE program areas (proposed rules WAC 180-51-230 (5)(h)). This means a student could combine a credit in cosmetology with a credit in welding and meet the requirement of his/her graduation pathway.

This approach is in conflict with the intent of the legislation, which is to provide access to postsecondary training and education, careers, or apprenticeship through a **"sequenced progression** of multiple courses that are technically intensive and rigorous" (RCW 28A.700.030). Allowing unrelated and unaligned CTE courses does not meet the definition of "sequenced progression" currently in statute. Completing a credit of cosmetology and a credit of welding may "check the box" for graduation, but it undermines our state-wide efforts in CTE and may not result in articulated access for students to employment and/or training after high school in a related field.

Washington State is a national leader in career and technical education. The changes anticipated in the proposed rules lowers the bar for CTE pathways, undermines the value of a strong CTE program and would make Washington state one of the least rigorous states when it comes to CTE education, particularly at a time when every state is engaged in federal Perkins accountability planning. Further, these rules will negatively impact the work being done through Career Connect Washington, the Work Integrated Learning Advisory Committee (WILAC) and public-private programming across the state.

Finally, I am significantly concerned that creating a low bar for CTE Graduation Pathways exacerbates inequities for students of color, students with disabilities and students from low-income communities. I have seen time and again the least rigorous, least powerful pathways become the default for many of these students—and that must change. Our efforts in K-12 in our laws, rules, policies or practices should be geared toward maximizing postsecondary opportunities for ALL of Washington's students.

I request you amend your draft rules to mirror the language in House Bill 1599 and the reference to RCW 28A.700.030. Specifically, eliminate the language permitting mix and matching CTE courses and require the CTE courses to be a true sequenced progression. The amendatory language for this section of the proposed rules which would accomplish this goal is found on the following page(s) of this letter.

Sincerely,

Shani Watkins

h) **Career and technical education course sequence.** Complete a sequence of career and technical education courses.

(i) For this subsection, "sequence" is defined as: Two or more high school credits of career and technical education courses in a **sequenced** progression tailored to the student's goals and relevant to the postsecondary pathway(s) outlined in the student's high school and beyond plan. A student's sequence of career and technical education courses to satisfy this pathway (~~(may)~~) **must** be comprised of courses within the same career and technical education program area ~~or courses within more than one career and technical education program area, as determined relevant by the student's high school and beyond plan in consultation with school personnel.~~ A student's career and technical education course sequence (~~(may)~~) **must** include courses leading to workforce entry, state or nationally approved apprenticeships, or postsecondary education.

(ii) Satisfying this pathway does not require a student to take any courses that are part of a career and technical education preparatory program as described in RCW [28A.700.030](#).

(iii) Each sequence of career and technical education courses must include at least one course that meets the requirements in (h)(i)(A) or (B) of this subsection:

(A) The minimum criteria identified in RCW [28A.700.030](#):

(I) Either:

- Lead to a certificate or credential that is state or nationally recognized by trades, industries, or other professional associations as necessary for employment or advancement in that field; or

- Allow students to earn dual credit for high school and college through tech prep, advanced placement, or other agreements or programs;

(II) Be comprised of a sequenced progression of multiple courses that are technically intensive and rigorous; and

(III) Lead to workforce entry, state or nationally approved apprenticeships, or postsecondary education in a related field.

(B) The curriculum requirements of core plus programs for aerospace, maritime, health care, information technology, or construction and manufacturing.

(iv) Satisfying this pathway does not require students to meet the separate English and mathematics graduation pathway requirements of pathway options (a) through (f) of this subsection.

(v) A course that is used to meet graduation pathway requirements may also be used to meet credit subject area requirements, including career and technical education course equivalencies per RCW [28A.700.070](#).

Citizens Patrol

Citizens Patrol is a group of dedicated and passionate individuals who serve as the community forefront of the Lynnwood Police Department. They play a pivotal role in providing volunteering services to enhance the quality of life for our diverse Lynnwood communities. Come join us and together we build a safer community!



LYNNWOOD
WASHINGTON
POLICE



*Traffic control training during
Citizens Patrol Training Academy.*

WHAT DO CITIZENS PATROL MEMBERS DO?

- Provide traffic control during major incidents
- Issue disabled violation citations
- Open locked car doors and jumpstart vehicles for citizens
- Provide interpretation services for Lynnwood Officers
- Assist with special community and City events
- And many more projects as assigned

CITIZENS PATROL TRAINING ACADEMY

This unique five-week course is provided by Lynnwood Police Officers and experienced Citizens Patrol members to help potential candidates acquire the necessary skill set to become proficient in performing all Citizens Patrol related tasks in a safe and professional manner.

HOW TO GET STARTED

Citizens who are interested in volunteering for Citizens Patrol must complete a volunteer application, have a good driving record and be able to pass a criminal background check. Apply online at the Lynnwood Police Department website under the Career and Opportunities section.

Want more information about Citizens Patrol?

- Call us at 425.670.5639
- Email us at crimeprevention@lynnwoodwa.gov
- Visit us online at the Lynnwood Police Department website





PO Box 658 / Olympia, WA 98507-0658 / 1414 Cherry St., SE / Olympia, WA 98501 / 360.943.1600 / awb.org

October 21, 2019

Dear State Board of Education members and staff,

We strongly request your organization's reconsideration of the SBE proposed language regarding the career and technical education (CTE) graduation pathway. We believe the proposed rules do not reflect the intention of the statute, will weaken Washington's investments in meaningful CTE programming, and will exacerbate inequalities in our education system.

The proposed rules would permit **any two credits of CTE** to qualify for this graduation pathway, allowing for a mix and match of CTE courses from across different CTE program areas (proposed rules WAC 180-51-230 (5)(h)). This means a student could combine a credit in cosmetology with a credit in welding and meet the requirement of this graduation pathway.

We believe this approach is in conflict with the intent of the legislation, which is to provide access to postsecondary training and education, careers, or apprenticeship through a "**sequenced progression** of multiple courses that are technically intensive and rigorous" (RCW 28A.700.030). Allowing unrelated and unaligned CTE courses does not meet the definition of "sequenced progression". Completing a credit of cosmetology and a credit of welding may "check the box" for graduation, but it undermines our state-side efforts in CTE and may not result in articulated access for students to employment and/or training after high school in a related field.

Washington state is a national leader in career and technical education. The changes anticipated in the proposed rules lowers the bar for CTE pathways, undermines the value of a strong CTE program and would make Washington state one of the least rigorous states when it comes to CTE education, particularly at a time when every state is engaged in federal Perkins accountability planning. Further, these rules will negatively impact the work being done through Career Connect Washington, the Work Integrated Learning Advisory Committee (WILAC) and public-private programming across the state.

Finally, we are significantly concerned that creating a low bar for CTE Graduation Pathways will exacerbate inequities for students of color, students with disabilities and students from low-income communities. We have seen time and again the least rigorous, least powerful pathways become the default for many of these students—and that must change. Our efforts in K-12, whether they are laws, rules, policies or practices, should be geared toward maximizing postsecondary opportunities for ALL of Washington's students.

We request you amend your draft rules to mirror the language in House Bill 1599 and the reference to RCW 28A.700.030. Specifically, we request you eliminate the language permitting mix and matching CTE courses and require the CTE courses to be a true sequenced progression. We have attached amendatory language for this section of the proposed rules which would accomplish this goal.

Sincerely,

A handwritten signature in blue ink that reads "Gary Chandler". The signature is written in a cursive, flowing style.

Gary Chandler

Vice President of Government Affairs

Proposed Rule WAC 180-51-230

h) **Career and technical education course sequence.** Complete a sequence of career and technical education courses.

(i) For this subsection, "sequence" is defined as: Two or more high school credits of career and technical education courses in a sequenced progression tailored to the student's goals and relevant to the postsecondary pathway(s) outlined in the student's high school and beyond plan. A student's sequence of career and technical education courses to satisfy this pathway ~~((may))~~ must be comprised of courses within the same career and technical education program ~~area or courses within more than one career and technical education program area, as determined relevant by the student's high school and beyond plan in consultation with school personnel.~~ A student's career and technical education course sequence ~~((may))~~ must include courses leading to workforce entry, state or nationally approved apprenticeships, or postsecondary education.

(ii) Satisfying this pathway does not require a student to take any courses that are part of a career and technical education preparatory program as described in RCW 28A.700.030.

(iii) Each sequence of career and technical education courses must include at least one course that meets the requirements in (h) (i) (A) or (B) of this subsection:

(A) The minimum criteria identified in RCW 28A.700.030:

(I) Either:

- Lead to a certificate or credential that is state or nationally recognized by trades, industries, or other professional associations as necessary for employment or advancement in that field; or

- Allow students to earn dual credit for high school and college through tech prep, advanced placement, or other agreements or programs;

(II) Be comprised of a sequenced progression of multiple courses that are technically intensive and rigorous; and

(III) Lead to workforce entry, state or nationally approved apprenticeships, or postsecondary education in a related field.

(B) The curriculum requirements of core plus programs for aerospace, maritime, health care, information technology, or construction and manufacturing.

(iv) Satisfying this pathway does not require students to meet the separate English and mathematics graduation pathway requirements of pathway options (a) through (f) of this subsection.

(v) A course that is used to meet graduation pathway requirements may also be used to meet credit subject area requirements, including career and technical education course equivalencies per RCW 28A.700.030.



Washington State Board of Education
c/o Randy Spaulding, Executive Director
600 Washington Street
Olympia, WA 98504

Dear State Board of Education members and staff,

We at Stand for Children Washington are writing to advocate for further changes to the Board's draft rules for Graduation Pathway options prior to their final approval. We believe the CTE option, in its current form, risks becoming a checkbox that will leave students gravely underprepared for life after high school. In addition, we request that the Board strengthen language for the dual credit and ASVAB pathways to ensure students are equipped to access the postsecondary option of their choice.

Regarding the CTE pathway, the language of HB 1599 is clear in its intention: to provide students with the opportunity to "complete a sequence of career and technical education courses that are relevant to a student's postsecondary pathway, including those leading to workforce entry, state or nationally approved apprenticeships, or postsecondary education." (RCW 28A.700.030) In other words, students should have the opportunity to complete a CTE pathway that is relevant, rigorous, and aligned with their career goals and the labor market.

The proposed rule, in contrast, allows students to qualify for graduation with any two CTE credits, regardless of whether these courses constitute a sequence or are picked from different programs or content areas. Mixing and matching individual courses does not create a coherent pathway and does not adhere to the legislature's intent. The proposed rule would also place an unnecessary burden on families to verify whether their student's CTE pathway would provide relevant preparation for career and life.

As addressed in previous correspondence with the Board, we are also concerned that the dual credit and ASVAB pathways do not reflect the intent of the statute. Regarding the dual credit pathway, HB 1599 specifically states "complete and qualify for college credit." The responsibility should lie with districts and the state to help students from low income backgrounds access funding to pay for fees associated with claiming college credit. As currently written, the rule risks rubber stamping a system in which students may take the same course and only those with means receive dual credit. Stand intends to make reducing dual credit costs a critical part of our advocacy during the 2020 legislative session. Finally, tying the ASVAB pathway to the minimum standard creates too low of an expectation and does not reflect the intent of HB 1599 to create pathways of comparable rigor.

We urge the State Board to amend the draft rules to adhere to the statute language by requiring the CTE pathway to include a **sequenced progression of courses** meeting the requirements of Core Plus programs or CTE preparatory courses/programs. We recommend that the State Board incorporate OSPI's requested language changes into final rules. In addition, we also recommend the State Board



ensure students are able to enter the postsecondary pathway of their choice by requiring students to qualify for college credit, and meeting standard on the ASVAB for the military branch which they identified on their high school and beyond plan.

We appreciate the Board's consideration.

Sincerely,

A handwritten signature in black ink, appearing to be "Libuse Binder". The signature is stylized and somewhat abstract, with a large loop at the end.

Libuse Binder
Executive Director, Stand for Children Washington

To: State Board of Education members and staff

From: Sarah Magney, WA FBLA Operations Director, WA-ACTE member

Date: October 18, 2019

I strongly request reconsideration of the SBE proposed language regarding the career and technical education (CTE) graduation pathway. I believe the proposed rules do not reflect the intention of the statute, weakens Washington's investments in meaningful CTE programming, and exacerbates inequalities in our education system. For far too long vocational education was seen as a less than for students, the current proposed rules returns CTE to those days. With all the work in our state to leverage CTE for all students to become successful contributing members of society, the economy and life, this will be a serious step back!

The proposed rules permit **any two credits of CTE** to qualify for this graduation pathway, allowing for a mix and match of CTE courses from across different CTE program areas (proposed rules WAC 180-51-230 (5)(h)). This means a student could combine a credit in cosmetology with a credit in welding and meet the requirement of his/her graduation pathway.

This approach is in conflict with the intent of the legislation, which is to provide access to postsecondary training and education, careers, or apprenticeship through a "**sequenced progression** of multiple courses that are technically intensive and rigorous" (RCW 28A.700.030). Allowing unrelated and unaligned CTE courses does not meet the definition of "sequenced progression" currently in statute. Completing a credit of cosmetology and a credit of welding may "check the box" for graduation, but it undermines our state-wide efforts in CTE and may not result in articulated access for students to employment and/or training after high school in a related field.

Washington State is a national leader in career and technical education. The changes anticipated in the proposed rules lowers the bar for CTE pathways, undermines the value of a strong CTE program and would make Washington state one of the least rigorous states when it comes to CTE education, particularly at a time when every state is engaged in federal Perkins accountability planning. Further, these rules will negatively impact the work being done through Career Connect Washington, the Work Integrated Learning Advisory Committee (WILAC) and public-private programming across the state.

Finally, I am significantly concerned that creating a low bar for CTE Graduation Pathways exacerbates inequities for students of color, students with disabilities and students from low-income communities. I have seen time and again the least rigorous, least powerful pathways become the default for many of these students—and that must change. Our efforts in K-12 in our laws, rules, policies or practices should be geared toward maximizing postsecondary opportunities for ALL of Washington's students.

I request you amend your draft rules to mirror the language in House Bill 1599 and the reference to RCW 28A.700.030. Specifically, eliminate the language permitting mix and matching CTE courses and require the CTE courses to be a true sequenced progression. The amendatory language for this section of the proposed rules which would accomplish this goal is found on the following page(s) of this letter.

Proposed Rule WAC 180-51-230

h) **Career and technical education course sequence.** Complete a sequence of career and technical education courses.

(i) For this subsection, "sequence" is defined as: Two or more high school credits of career and technical education courses in a **sequenced** progression tailored to the student's goals and relevant to the postsecondary pathway(s) outlined in the student's high school and beyond plan. A student's sequence of career and technical education courses to satisfy this pathway (~~(may)~~)**must** be comprised of courses within the same career and technical education program area ~~or courses within more than one career and technical education program area, as determined relevant by the student's high school and beyond plan in consultation with school personnel.~~ A student's career and technical education course sequence (~~(may)~~)**must** include courses leading to workforce entry, state or nationally approved apprenticeships, or postsecondary education.

(ii) Satisfying this pathway does not require a student to take any courses that are part of a career and technical education preparatory program as described in RCW [28A.700.030](#).

(iii) Each sequence of career and technical education courses must include at least one course that meets the requirements in (h)(i)(A) or (B) of this subsection:

(A) The minimum criteria identified in RCW [28A.700.030](#):

(I) Either:

- Lead to a certificate or credential that is state or nationally recognized by trades, industries, or other professional associations as necessary for employment or advancement in that field; or

- Allow students to earn dual credit for high school and college through tech prep, advanced placement, or other agreements or programs;

(II) Be comprised of a sequenced progression of multiple courses that are technically intensive and rigorous; and

(III) Lead to workforce entry, state or nationally approved apprenticeships, or postsecondary education in a related field.

(B) The curriculum requirements of core plus programs for aerospace, maritime, health care, information technology, or construction and manufacturing.

(iv) Satisfying this pathway does not require students to meet the separate English and mathematics graduation pathway requirements of pathway options (a) through (f) of this subsection.

(v) A course that is used to meet graduation pathway requirements may also be used to meet credit subject area requirements, including career and technical education course equivalencies per RCW [28A.700.070](#).



October 22, 2019

WA State Board of Education
rulescoordinatorSBE@k12.wa.us
RE: Changes to Chapter 180.51
WAC | High School Graduation

On behalf of the Washington State PTA, we would like to submit formal comments in favor of the draft rules as proposed by the State Board of Education regarding implementation of HB 1599 (Chapter 252, Laws of 2019).

As you know, Washington State PTA (WSPTA) has been engaged in the “assessment requirements” issue for many years, opposing legislation and policies that allow a single factor to determine a student’s advancement, including graduation from high school. During the 2019 session, WSPTA worked closely with bill sponsor Rep. Monica Stonier on elements and amendments to HB 1599 to address parents’ concerns – most of which were incorporated in the bill as it progressed through the House and then the Senate. We also supported many of the elements proposed by the State Board of Education through its agency-request legislation – again, many of which were adopted in the enacted legislation.

WSPTA’s vision is that every child’s potential become a reality. As such, we encourage the State Board of Education to keep these rules as broad and flexible as the legislation will allow. These draft rules are a good step forward. The following are a few comments we would like to share for your consideration:

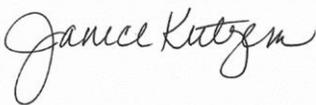
1. For both the military entrance exam and Career and Technical Education subsections, we support that the pathways described in (1)-(6) are not required for students pursuing these pathways and appreciate the clarification in the rules to that end;
2. We wholeheartedly support the new WAC 180.51.230 (5)(h)(i) in the CTE pathways subsection. While WSPTA would have liked to see a specific job-embedded pathway option for students who are pursuing a career directly following high school, our leadership in particular supports the language in this subsection that recognizes courses that are complementary to a student’s post-secondary goals but may not be in the same program of study. Please maintain this option for students to mix and match CTE courses that allow them to pursue a specific program area or ones that are relevant.
 - For example, a student may take one credit of welding, a half-credit of marketing, and a half-credit of financial literacy to prepare for a career path as a metal art designer. This is a valid pathway.

- In our experience, many small, rural or remote schools may not offer a large selection of CTE courses (e.g., aviation 1, aviation 2), employ more than 1 or 2 CTE instructors, or have access to a skill center (e.g., two years of culinary arts). Even in more urban schools, students may get waitlisted in CTE courses and be unable to complete what is described as a sequence in a strict sense. This subsection recognizes the need to make the rule student-centered and focused on student success, and to value all pathways.
 - Having flexibility and allowing a student's High School and Beyond Plan to drive a student's course-taking is imperative, particularly for students who are not planning a college-bound path. We believe this rule approach does just that.
3. WSPTA supports the draft rules related to the ASVAB pathway, setting the passing score at the score used by the military. We know that this number can rise or fall depending on the number of applicants and by branch and think this is a smart approach. To try to set a score in WAC would only lead to reopening the rules every time the military changes it and would place a burden on parents, students and counselors trying to keep up.
 4. During the 2014 legislative session, WSPTA worked closely with education associations on the 24-credit high school graduation bill, E2SSB 6552. An important component of this legislation was to ensure that students had access to a CTE equivalency/dual credit opportunity for the third credit of math and of science. This option was designed to help students align an area of postsecondary interest with those specific credits. Under HB 1599, students who plan to use the CTE pathway to graduate do not need to meet one of the math pathways and we appreciate the clarification in proposed WAC 180.51.230(h)(v).

On behalf of the more than 125,000 members of Washington State PTA statewide, we appreciate your work on these important rules. As we said at the beginning, we encourage the State Board to keep the rules as broad and flexible as possible. With the 2020 session approaching, there will be an opportunity to work with the bill's sponsor and stakeholders if clarification is needed.

If you have any questions about the suggestions or comments, please contact either of us directly or WSPTA legislative consultant Marie Sullivan at legconsultant@wastatepta.org.

Sincerely,



Janice Kutzera
President
ptapres@wastatepta.org



Sherry Rudolph
Advocacy Director
ptaadvocacydir@wastatepta.org



SBE Ruling on CTE

RELATED TO HB1599 – CTE CREDITS
FOR GRADUATION

Dear State Board of Education members and staff,

The Washington FFA State Officers strongly request your organization's reconsideration of the SBE proposed language regarding the career and technical education (CTE) graduation pathway. We believe the proposed rules do not reflect the intention of the statute and will weaken the impact of Washington's CTE programming, and fail to properly prepare students for the workforce.

The proposed rule would permit **any two credits of CTE** to qualify for this graduation pathway, allowing for a mix and match of CTE courses from across different CTE program areas (proposed rules WAC 180-51-230 (5)(h)). This means a student could combine a credit in cosmetology with a credit in welding and meet the requirement of this graduation pathway.

OSPI believes this is potentially in conflict with the intent of the legislation, which is to provide access to postsecondary training and education, careers, or apprenticeship through a "**sequenced progression** of multiple courses that are technically intensive and rigorous" (RCW 28A.700.030). While the flexibility proposed in the SBE rules may provide "flexibility" to students in regard to graduation and their High School and Beyond Plan (HSBP), it is not aligned with CTE program guidance and accountability and will create inconsistency and conflict with our CTE program.

When visiting agricultural programs across our state, we notice that students who take multiple Ag classes perform at a higher level than those who take one class in the pathway. Not only do the students function at a higher level, but the CTE program grows in its success as they are receiving more engagement. The proposed rule will negatively impact the membership of CTSO's as it does not support fluidity and guidance between these CTE classes and these organizations.

As student representatives for a CTSO we agree with OSPI's position on this issue. This consistency will allow students to grow and expand their knowledge in one area as opposed to gaining surface level knowledge in a variety of areas. We believe that if our members were required to take a sequence of agricultural classes, they will enter the workplace better prepared to serve the labor shortage in our industry. During our recent visits to 15 agricultural businesses in our state we consistently heard about and witnessed the need for skilled and dedicated workers. Once again, taking two courses in the same pathway not only enhances skills, but values commitment to a field.

We request you amend your draft rules to more specifically mirror the language in the bill and the reference to RCW 28A.700.030, eliminating the language permitting mix and matching CTE courses, and requiring the CTE courses to be a sequenced progression. We have attached amendatory language for this section of the proposed rules which would accomplish this goal.

Sincerely,
The 2019-2020 Washington FFA State Officer team



October 22, 2019

Washington State Board of Education
600 Washington Street SE
P.O. Box 47206
Olympia, WA 98504

To whom it may concern:

We appreciate the opportunity to provide comments to the proposed changes to Washington Administrative Code (WAC) Chapter 180-51 with the intent of influencing additional changes to the final WAC.

To best prepare for postsecondary opportunities we recognize that students should take full advantage of the comprehensive options available to them throughout their high school career. The graduation pathways established through the passage of House Bill 1599 provide an opportunity for students to evaluate their current skills and knowledge in relation to their post-high school goals and determine through the High School and Beyond Plan the graduation pathway that best aligns.

It is critical that the graduation pathways established in WAC Chapter 180-51 are rigorous, structured to ensure equity for each pathway, and clear and well communicated to ease the complexity for students, families, advisors and teachers.

We have reviewed the proposed changes to WAC Chapter 180-51. Overall, and as the following comments and proposals indicate, we are concerned about the inconsistency of rigor and quality across the proposed graduation pathways. As educators we know that the least rigorous and lowest quality pathways become the default for many students, especially those who identify as underrepresented. In addition, the proposed rules create confusion and lack clarity for education stakeholders in their implementation and communication to families and students.

Within this context we propose the following comments, many of which have been previously shared either in writing or verbally to the State Board of Education:

- WAC 180-51-030: Allows a student and the student's family upon graduation to determine if high school credit taken prior to high school may be removed from the high school transcript or be transcribed with a non-numerical grade. We support the intent of the language to ensure high school transcripts reflect high school courses taken in middle school. This creates an accurate high school transcript and removes barriers for students and families to identify high school courses taken later on. However, we are concerned with the time allowed a student and/or family to change a high school transcript. The high school transcript should reflect high school courses taken. We propose a shorter time period for students to make changes to their high school transcript, including the change from a numerical grade to a non-numerical grade or removal of a course from the high school transcript, to the first term of the student's 10th grade year.

- WAC 180-51-230 (b): According to House Bill 1599 (HB 1599) students may meet a graduation pathway if they complete and qualify for college credit in dual credit courses. Dual credit is defined in HB 1599 as a course in which a student *qualifies* for college and high school credit. The proposed WAC defines dual credit course in which a student is *eligible* for high school and college credit. The WAC further states, “nothing in this subsection requires a student to pay fees or claim college credit to meet this pathway.”

Eligible for college credit and qualifying for college credit are not the same. A student is eligible to participate in College in the High School or Running Start without qualifying for college credit. To be eligible a student must meet the criteria outlined in statute.

To qualify for college credit for College in the High School and Running Start, however, a student must earn the credit and the credit must be transcribed on a college or university transcript. Students may also be responsible for the costs associated with earning college credit, depending on the dual credit program.

In addition, it is important to distinguish between concurrent enrollment and college preparatory programs with exams in Washington. Concurrent enrollment courses are college courses taught at either a college, university or high school for which students earn college credit. This differs from AP/IB/Cambridge which are high school courses that prepare students for college and may be eligible for college credit based on exam scores that students complete after they finish the course.

Finally, the dual credit course pathway is intended to meet English language arts and/or mathematics requirements for high school graduation. However, most CTE Dual Credit courses do not meet equivalency criteria for high school mathematics or English language arts.

We propose the Board use the language in statute which states students must qualify for college and high school credit in order to complete this pathway. This aligns the WAC with statute and also recognizes the difference between credits earned in college courses while in high school (Running Start and College in the High School, for example) and the separate process for earning college credit at postsecondary institutions through exams that students take after completing college-level high school courses (AP, IB, Cambridge, for example). In addition, we propose removing CTE Dual Credit from the dual credit course pathway, as most CTE Dual Credit courses do not meet equivalency criteria for high school mathematics or English language.

- WAC 180-51-230 (d)(ii): House Bill 1599 does not distinguish International Baccalaureate Standard and Higher-Level Exams or Cambridge International A-Level and AS-Levels exams. To align with existing statute established with the passage of Senate Bill 5410, we propose the Board specifically list International Baccalaureate Standard and Higher-Level exams and A-Level and AS-Level Cambridge exams to create consistency and clarity.
- WAC 180-51-230 (d)(ii): House Bill 1599 states a student may meet a graduation pathway if a student earns high school credit with a C+ grade or earns a three or higher on the Advanced Placement exam or equivalent for IB and Cambridge. WAC 180-51-230 states that a student meets the graduation pathway for a grade of E/e or higher on a Cambridge International exam. However, according to Cambridge International, a grade of C/c or higher on a Cambridge exam would be required to meet the C+ threshold identified in statute. We

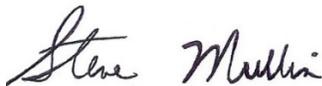
propose the Board change the threshold from a grade of E/e to a grade of C/c for Cambridge International to meet the language in House Bill 1599.

- WAC 180-51-230(g): A student is required to meet the minimum exam score for the Armed Services Vocational Aptitude Battery (ASVAB) for all the armed services. The ASVAB score determines if a student is eligible to enlist in the armed services, eligible to enlist in a specific branch of the armed services, determine an individual's Army Military Occupation Specialty. The higher a score, the more enlistment opportunities an individual will be exposed. We propose the Board reconsider the threshold in WAC and raise the minimum requirement to align with the level of rigor and quality required of the other graduation pathways especially since the ASVAB pathway substitutes a student from meeting separate English and mathematic graduate pathway requirements in WAC 180-51-230(a-f).
- WAC 180-51-230 (5)(h): This section permits any two credits of CTE to qualify for this graduation pathway, allowing for a mix and match of CTE courses from across different CTE program areas. A mix-and-match approach undermines meaningful CTE pathways, which provide real access for students to employment and/or training after high school in a related field. While the proposed rule would enable student flexibility, it does not prepare a student for post-secondary success and undermines our state-wide efforts in CTE. We are concerned that creating this low bar for CTE Graduation Pathways will amplify inequities for students of color, students with disabilities, and students from low-income communities.
- Students may use multiple graduation pathways to meet the mathematics and English language arts requirements. The WAC currently includes in subsections 180-51-230 (b) and (c) "and" suggesting that to meet a pathway a student must earn high school credit in both English language arts and mathematics through the same graduation pathway. We propose clarifying in section 18-051-230 that students can meet the math requirement and the English language arts requirement through different pathways.

We are committed to post high school opportunities that engage the whole student through multiple modalities, programs, services, and credentials in high school which allow students to successfully pursue their educational and career goals throughout their lifetimes.

We appreciate the opportunity to provide comments on the changes under consideration by the Board and we ask that you consider our comments and recommendations in the final draft of the WAC.

Sincerely,



Steve Mullin, President
Washington Roundtable



Paul Francis, Executive Director
Council of Presidents



Jan Yoshiwara, Executive Director
SBCTC



PO Box 658 / Olympia, WA 98507-0658 / 1414 Cherry St., SE / Olympia, WA 98501 / 360.943.1600 / awb.org

October 21, 2019

Dear State Board of Education members and staff,

We strongly request your organization's reconsideration of the SBE proposed language regarding the career and technical education (CTE) graduation pathway. We believe the proposed rules do not reflect the intention of the statute, will weaken Washington's investments in meaningful CTE programming, and will exacerbate inequalities in our education system.

The proposed rules would permit **any two credits of CTE** to qualify for this graduation pathway, allowing for a mix and match of CTE courses from across different CTE program areas (proposed rules WAC 180-51-230 (5)(h)). This means a student could combine a credit in cosmetology with a credit in welding and meet the requirement of this graduation pathway.

We believe this approach is in conflict with the intent of the legislation, which is to provide access to postsecondary training and education, careers, or apprenticeship through a "**sequenced progression** of multiple courses that are technically intensive and rigorous" (RCW 28A.700.030). Allowing unrelated and unaligned CTE courses does not meet the definition of "sequenced progression". Completing a credit of cosmetology and a credit of welding may "check the box" for graduation, but it undermines our state-side efforts in CTE and may not result in articulated access for students to employment and/or training after high school in a related field.

Washington state is a national leader in career and technical education. The changes anticipated in the proposed rules lowers the bar for CTE pathways, undermines the value of a strong CTE program and would make Washington state one of the least rigorous states when it comes to CTE education, particularly at a time when every state is engaged in federal Perkins accountability planning. Further, these rules will negatively impact the work being done through Career Connect Washington, the Work Integrated Learning Advisory Committee (WILAC) and public-private programming across the state.

Finally, we are significantly concerned that creating a low bar for CTE Graduation Pathways will exacerbate inequities for students of color, students with disabilities and students from low-income communities. We have seen time and again the least rigorous, least powerful pathways become the default for many of these students—and that must change. Our efforts in K-12, whether they are laws, rules, policies or practices, should be geared toward maximizing postsecondary opportunities for ALL of Washington's students.

We request you amend your draft rules to mirror the language in House Bill 1599 and the reference to RCW 28A.700.030. Specifically, we request you eliminate the language permitting mix and matching CTE courses and require the CTE courses to be a true sequenced progression. We have attached amendatory language for this section of the proposed rules which would accomplish this goal.

Sincerely,

A handwritten signature in blue ink that reads "Gary Chandler". The signature is written in a cursive, flowing style.

Gary Chandler

Vice President of Government Affairs

Proposed Rule WAC 180-51-230

h) **Career and technical education course sequence.** Complete a sequence of career and technical education courses.

(i) For this subsection, "sequence" is defined as: Two or more high school credits of career and technical education courses in a sequenced progression tailored to the student's goals and relevant to the postsecondary pathway(s) outlined in the student's high school and beyond plan. A student's sequence of career and technical education courses to satisfy this pathway ~~((may))~~ must be comprised of courses within the same career and technical education program ~~area or courses within more than one career and technical education program area, as determined relevant by the student's high school and beyond plan in consultation with school personnel.~~ A student's career and technical education course sequence ~~((may))~~ must include courses leading to workforce entry, state or nationally approved apprenticeships, or postsecondary education.

(ii) Satisfying this pathway does not require a student to take any courses that are part of a career and technical education preparatory program as described in RCW 28A.700.030.

(iii) Each sequence of career and technical education courses must include at least one course that meets the requirements in (h) (i) (A) or (B) of this subsection:

(A) The minimum criteria identified in RCW 28A.700.030:

(I) Either:

- Lead to a certificate or credential that is state or nationally recognized by trades, industries, or other professional associations as necessary for employment or advancement in that field; or

- Allow students to earn dual credit for high school and college through tech prep, advanced placement, or other agreements or programs;

(II) Be comprised of a sequenced progression of multiple courses that are technically intensive and rigorous; and

(III) Lead to workforce entry, state or nationally approved apprenticeships, or postsecondary education in a related field.

(B) The curriculum requirements of core plus programs for aerospace, maritime, health care, information technology, or construction and manufacturing.

(iv) Satisfying this pathway does not require students to meet the separate English and mathematics graduation pathway requirements of pathway options (a) through (f) of this subsection.

(v) A course that is used to meet graduation pathway requirements may also be used to meet credit subject area requirements, including career and technical education course equivalencies per RCW 28A.700.030.



Rural Education Center

Jim Kowalkowski, Director
jimkowalkowski@davenport.wednet.edu
Web Site: <http://ruraledcenter.wsu.edu/>
In Partnership with...
Washington State University & NorthEastern Washington ESD 101

Housed at Davenport School District
801 7th Street
Davenport, WA 99122
Ph.: (509)725-1481 · Fax: (509) 725-2260

October 23, 2019

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

Re: Feedback on Proposed Rules RE: CTE Graduation Pathways

On behalf of the members of the Rural Education Center, I respectfully request that you keep the current proposed language regarding the Career and Technical Education Course Sequence that would allow a student to satisfy the CTE pathway with successful completion of two courses within the same program area OR within more than one program area.

Our small and rural school districts (and in some cases even larger districts) are limited in the CTE offerings due to a multitude of reasons. Availability of CTE instructors combined with budget restraints are challenges that most small and rural districts face. Small districts that do offer CTE programs often are only able to one or two sections of a specific CTE course. In larger districts, more sections are usually offered. Your current proposed rules do provide flexibility and allow for a student to not be hindered or prevented from graduation due to a schedule conflict or lack of opportunity in a specific school.

Your current definition of “sequence” includes “...**in a progression tailored to the student’s goals and relevant to the postsecondary pathway(s) in the student’s high school and beyond plan.**” School districts want to be able to provide students with opportunities to explore potential future careers...this is a foundational premise to CTE! I disagree with OSPI’s concern that providing flexible options to CTE pathways will result in a CTE courses merely being “a checkbox for graduation”.

By allowing the choice of taking two courses within the same program area OR taking two courses within more than one program area, we are allowing students to focus on their High School & Beyond Plans to follow an instructional path that best fits each individual student’s needs. Isn’t that what is really important?

Sincerely,



Jim Kowalkowski
Executive Director

JAY R. INSLEE
Governor

SUZAN G. LEVINE
Commissioner



STATE OF WASHINGTON
EMPLOYMENT SECURITY DEPARTMENT

PO Box 9046 • Olympia WA 98507-9046

October 22, 2019

Dear State Board of Education members and staff,

We strongly request reconsideration of the proposed language regarding the career and technical education (CTE) graduation pathway. We believe the proposed rules do not reflect the intention of the statute, will weaken Washington's investments in meaningful CTE programming, and will exacerbate inequalities in our education system.

The proposed rule would permit **any two credits of CTE** to qualify for this graduation pathway, allowing for a mix and match of CTE courses from across different CTE program areas (proposed rules WAC 180-51-230 (5)(h)). As State Board of Education members have mentioned, this means a student could combine a credit in cosmetology with a credit in welding and meet the requirement of this graduation pathway.

We believe this approach misses the point of the legislation to provide access to postsecondary training and education, careers, or apprenticeship through a "**sequenced progression** of multiple courses that are technically intensive and rigorous" (RCW 28A.700.030). We cannot understand how any two CTE courses could meet the definition of "sequenced progression".

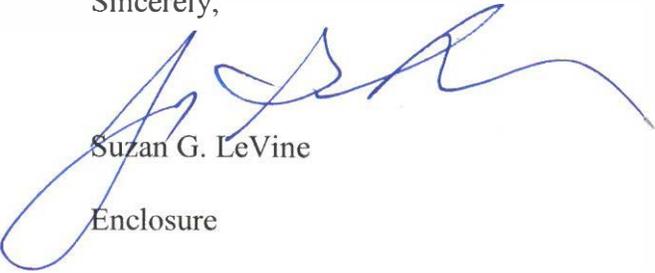
A mix and match approach undermines meaningful CTE pathways that provide real access for students to employment and/or training after high school in a related field. How would a credit of cosmetology and a credit of welding best prepare a student for that first employment opportunity after high school or begin to help meet the skilled worker needs of industry? It wouldn't.

Having such a low bar for a CTE pathway undermines the value of a strong CTE program and would make Washington one of the least rigorous states for CTE education, not the national leader in career and technical education that we all want Washington to be. The proposed rule sets back the work being done through Career Connect Washington, the Work Integrated Learning Advisory Committee (WILAC), and public-private programming across the state to prepare students for career pathways that are meaningful and meet the needs of Washington's economy. Just one example: a mix and match approach would not qualify as a Career Launch program, the ultimate goal of Career Connect Washington.

We are deeply concerned that creating this low bar for CTE Graduation Pathways will exacerbate, not solve, inequities for students of color, students with disabilities and students from low-income communities. While well-intentioned, the current proposed language and plan would yield the least rigorous, powerful and effective pathways for many of these students – exactly the opposite of what is needed.

We request you amend your draft rules to more specifically mirror the language in the bill and the reference to RCW 28A.700.030, eliminating the language permitting mix and matching CTE courses, and requiring the CTE courses to be a sequenced progression. We have attached amendatory language for this section of the proposed rules to accomplish this goal.

Sincerely,



Suzan G. LeVine

Enclosure

Proposed Rule WAC 180-51-230

h) **Career and technical education course sequence.** Complete a sequence of career and technical education courses.

(i) For this subsection, "sequence" is defined as: Two or more high school credits of career and technical education courses in a **sequenced** progression tailored to the student's goals and relevant to the postsecondary pathway(s) outlined in the student's high school and beyond plan. A student's sequence of career and technical education courses to satisfy this pathway (~~(may)~~) **must** be comprised of courses within the same career and technical education program ~~area or courses within more than one career and technical education program area, as determined relevant by the student's high school and beyond plan in consultation with school personnel.~~ A student's career and technical education course sequence (~~(may)~~) **must** include courses leading to workforce entry, state or nationally approved apprenticeships, or postsecondary education.

(ii) Satisfying this pathway does not require a student to take any courses that are part of a career and technical education preparatory program as described in RCW [28A.700.030](#).

(iii) Each sequence of career and technical education courses must include at least one course that meets the requirements in (h) (i) (A) or (B) of this subsection:

(A) The minimum criteria identified in RCW [28A.700.030](#):

(I) Either:

- Lead to a certificate or credential that is state or nationally recognized by trades, industries, or other professional associations as necessary for employment or advancement in that field; or

- Allow students to earn dual credit for high school and college through tech prep, advanced placement, or other agreements or programs;

(II) Be comprised of a sequenced progression of multiple courses that are technically intensive and rigorous; and

(III) Lead to workforce entry, state or nationally approved apprenticeships, or postsecondary education in a related field.

(B) The curriculum requirements of core plus programs for aerospace, maritime, health care, information technology, or construction and manufacturing.

(iv) Satisfying this pathway does not require students to meet the separate English and mathematics graduation pathway requirements of pathway options (a) through (f) of this subsection.

(v) A course that is used to meet graduation pathway requirements may also be used to meet credit subject area requirements, including career and technical education course equivalencies per RCW [28A.700.070](#).



Washington State Senate

October 22, 2019

Washington State Board of Education
P.O. Box 47206
Olympia, WA 98504-7206

Ladies and Gentlemen:

It has come to our attention that the State Board of Education (SBE), in rulemaking as prescribed by E2SHB 1599, has decided to propose a rule allowing for any two career and technical education (CTE) courses to qualify as a pathway to graduation.

The relevant sections of E2SHB 1599 have been codified at RCW Chapter 28A.655. RCW 28A.655.250(1)(b)(viii) provides in relevant part that to use CTE as a graduation pathway, a student must:

Complete a sequence of career and technical education courses that are relevant to a student's postsecondary pathway, including those leading to workforce entry, state or nationally approved apprenticeships, or postsecondary education, and that meet either: The curriculum requirements of core plus programs for aerospace, maritime, health care, information technology, or construction and manufacturing; or the minimum criteria identified in RCW [28A.700.030](#).

The reference to RCW 28A.700.030 is instructive. That section, which has been in effect in its current form since 2008, provides:

All approved preparatory secondary career and technical education programs must meet the following minimum criteria:

(1) Either:

(a) Lead to a certificate or credential that is state or nationally recognized by trades, industries, or other professional associations as necessary for employment or advancement in that field; or

(b) Allow students to earn dual credit for high school and college through tech prep, advanced placement, or other agreements or programs;

(2) Be comprised of a sequenced progression of multiple courses that are technically intensive and rigorous; and

(3) Lead to workforce entry, state or nationally approved apprenticeships, or postsecondary education in a related field.

The rule proposed by SBE conflicts with the plain language of RCW 28A.655.250(1)(b)(viii), which requires that the CTE courses comprise a "sequence". The term "sequence" is defined as "as set of related ... things that follow each other in a particular order". By contrast, the SBE's proposed rule does not require any relationship between the two CTE courses themselves; between the courses and the



Washington State Senate

student's postsecondary pathway; or between the courses and the requirements of the listed core plus programs.

The rule is also inconsistent with the intent of the legislature. As members of the Senate Early Learning & K-12 Education Committee, we can tell you that inclusion of the "sequence" language was deliberate. Had the bill contained the language in SBE's proposed rule, it would not have passed. In crafting alternative pathways to graduation, the legislature was deeply concerned with making sure that students using the CTE pathway would be prepared for direct workforce entry, apprenticeships, or related postsecondary education. SBE's proposed rule will not achieve that objective. We strongly urge you to rewrite the proposed rule and require a sequence of CTE courses consistent with the language of the statute.

Best regards,

Handwritten signature of Mark Mullet in black ink.

Senator Mark Mullet
5th Legislative District
Member- Senate Early Learning and K-12 Education Committee

Handwritten signature of Jesse Salomon in black ink.

Senator Jesse Salomon
32nd Legislative District
Member- Senate Early Learning and K-12 Education Committee

Handwritten signature of Lisa Wellman in black ink.

Senator Lisa Wellman
41st Legislative District
Chair- Senate Early Learning and K-12 Education Committee

Handwritten signature of Jamie Pedersen in black ink.

Senator Jamie Pedersen
43rd Legislative District
Member- Senate Early Learning and K-12 Education Committee

State Board of Education - Public Hearing October 24th, 2019

We the principals of the Northeast A League strongly request to uphold the State Board of Education's proposed language regarding the career and technical education graduation pathway. We believe the proposed rules reflect the intention of the statute, and do not weaken Washington's investments in meaningful CTE programming, and provide a more flexible and equitable education system.

The proposed rules permit two credits of CTE to qualify for this graduation pathway, allowing for a mix and match of CTE courses from across different CTE program areas. This provides flexibility to small districts and allows student-centered decisions related to individual needs and career interests. For example, a student interested in running their own construction company would be able to combine courses from Business and Marketing with Construction in a meaningful and relevant way.

This approach is in line with the intent of the legislation, which is to provide equitable access to postsecondary training and education, careers, or apprenticeship through a "sequenced progression of multiple courses that are technically intensive and rigorous" (RCW 28A.700.030). Identifying related and aligned CTE courses can meet the definition of "sequenced progression" dependent upon the postsecondary career aspirations of the student, referencing the importance of each student's High School and Beyond Plan.

Washington State is a national leader in career and technical education. The changes anticipated in the proposed rules provides an avenue for success for many students in a meaningful way within CTE pathways, shows the value of a strong CTE programs and demonstrates the importance Washington state puts on CTE education, particularly at a time when every state is engaged in federal Perkins accountability planning. Further, these rules will help support the work being done through Career Connect Washington, the Work Integrated Learning Advisory Committee and public-private programming across the state.

We request you uphold your draft rules for House Bill 1599 to provide equitable access to all school districts and students in relation to their individual career goals.

Thank you for considering the students of the NEA - Small Schools, Big Opportunities!

Brent Osborn, Lakeside HS
Kevin Knight, Colville HS
Joe Feist, Deer Park HS
Jamie Pancho, Newport HS

Clint Hull, Riverside HS
Renee Bailey, Freeman HS
Chris Spring, Medical Lake HS





Pullman School District No. 267
240 SE Dexter St
Pullman WA 99163
Phone: 509.332.3581
Fax: 509.336.7202

Ensuring learning while challenging each student to achieve full potential

October 23, 2019

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

Re: Feedback on Proposed Graduation Pathways

In the best interests of our students and community, we are providing feedback to you regarding the proposed Graduation Pathways related to students who receive special education services and the Career and Technical Education Course Sequence.

The removal of the Certificate of Individual Achievement (CIA) for students who receive special education services is especially problematic. The CIA has allowed students to test at a grade level matched to their skills and with consideration of the impact of their disability. Without this option, our graduation class of 2019 would have included nine fewer students. Our students who receive special education services may require significant modifications and/or accommodations in order to demonstrate academic success, however, they still should receive a high school diploma. Under the proposed rules, there is NO flexibility for this to happen. We do expect our students to receive access to the state math and English standards, but they may receive instruction at a level lower than their grade so that they can understand the content. It is difficult to understand why the CIA was an appropriate accommodation in the past and now it is not.

Related to the CTE pathway, it is critical to keep the current proposed language that allows students to satisfy this pathway with the successful completion of a course within the same program area or within more than one program. And, it is imperative that you allow this decision to be made locally.

Currently, the list of Core CTE courses that are automatic for the CTE pathway are courses not offered in our high school nor would some of them be appropriate. One standard in CTE is the inclusion of community advisory boards in each area that help to design offerings for *our community*. When the Core is defined as specific courses our students do not have access to it creates an inequity that we believe the State Board of Education has the obligation to ensure against on behalf of all students in the state.

Local school districts need to be entrusted to manage the CTE pathway appropriately. To suggest that some courses lack rigor is from someone who has not participated in the design or implementation of these specialized, highly rigorous courses. And, students must be able to choose to take one course in one CTE area and another course in a different area. We have removed many choices with the onset of Core 24 and we need to continue to engage students by providing them with choices. We urge you to allow language that offers students this kind of flexibility.

Sincerely,

Dr. Robert Maxwell, Superintendent

To: State Board of Education members and staff

From: Robert Reavis, Director; CTE, Spokane Public Schools

Date: 10/24/2019

I strongly request reconsideration of the SBE proposed language regarding the career and technical education (CTE) graduation pathway. I believe the proposed rules do not reflect the intention of the statute, weakens Washington's investments in meaningful CTE programming, and exacerbates inequalities in our education system. For far too long vocational education was seen as a less than for students, the current proposed rules returns CTE to those days. With all the work in our state to leverage CTE for all students to become successful contributing members of society, the economy and life, this will be a serious step back!

The proposed rules permit **any two credits of CTE** to qualify for this graduation pathway, allowing for a mix and match of CTE courses from across different CTE program areas (proposed rules WAC 180-51-230 (5)(h)). This means a student could combine a credit in cosmetology with a credit in welding and meet the requirement of his/her graduation pathway.

This approach is in conflict with the intent of the legislation, which is to provide access to postsecondary training and education, careers, or apprenticeship through a "**sequenced progression** of multiple courses that are technically intensive and rigorous" (RCW 28A.700.030). Allowing unrelated and unaligned CTE courses does not meet the definition of "sequenced progression" currently in statute. Completing a credit of cosmetology and a credit of welding may "check the box" for graduation, but it undermines our state-wide efforts in CTE and may not result in articulated access for students to employment and/or training after high school in a related field.

Washington State is a national leader in career and technical education. The changes anticipated in the proposed rules lowers the bar for CTE pathways, undermines the value of a strong CTE program and would make Washington state one of the least rigorous states when it comes to CTE education, particularly at a time when every state is engaged in federal Perkins accountability planning. Further, these rules will negatively impact the work being done through Career Connect Washington, the Work Integrated Learning Advisory Committee (WILAC) and public-private programming across the state.

Finally, I am significantly concerned that creating a low bar for CTE Graduation Pathways exacerbates inequities for students of color, students with disabilities and students from low-income communities. I have seen time and again the least rigorous, least powerful pathways become the default for many of these students—and that must change. Our efforts in K-12 in our laws, rules, policies or practices should be geared toward maximizing postsecondary opportunities for ALL of Washington's students.

I request you amend your draft rules to mirror the language in House Bill 1599 and the reference to RCW 28A.700.030. Specifically, eliminate the language permitting mix and matching CTE courses and require the CTE courses to be a true sequenced progression. The amendatory language for this section of the proposed rules which would accomplish this goal is found on the following page(s) of this letter.

Proposed Rule WAC 180-51-230

h) **Career and technical education course sequence.** Complete a sequence of career and technical education courses.

(i) For this subsection, "sequence" is defined as: Two or more high school credits of career and technical education courses in a **sequenced** progression tailored to the student's goals and relevant to the postsecondary pathway(s) outlined in the student's high school and beyond plan. A student's sequence of career and technical education courses to satisfy this pathway (~~(may)~~)**must** be comprised of courses within the same career and technical education program area ~~or courses within more than one career and technical education program area, as determined relevant by the student's high school and beyond plan in consultation with school personnel.~~ A student's career and technical education course sequence (~~(may)~~)**must** include courses leading to workforce entry, state or nationally approved apprenticeships, or postsecondary education.

(ii) Satisfying this pathway does not require a student to take any courses that are part of a career and technical education preparatory program as described in RCW [28A.700.030](#).

(iii) Each sequence of career and technical education courses must include at least one course that meets the requirements in (h)(i)(A) or (B) of this subsection:

(A) The minimum criteria identified in RCW [28A.700.030](#):

(I) Either:

- Lead to a certificate or credential that is state or nationally recognized by trades, industries, or other professional associations as necessary for employment or advancement in that field; or

- Allow students to earn dual credit for high school and college through tech prep, advanced placement, or other agreements or programs;

(II) Be comprised of a sequenced progression of multiple courses that are technically intensive and rigorous; and

(III) Lead to workforce entry, state or nationally approved apprenticeships, or postsecondary education in a related field.

(B) The curriculum requirements of core plus programs for aerospace, maritime, health care, information technology, or construction and manufacturing.

(iv) Satisfying this pathway does not require students to meet the separate English and mathematics graduation pathway requirements of pathway options (a) through (f) of this subsection.

(v) A course that is used to meet graduation pathway requirements may also be used to meet credit subject area requirements, including career and technical education course equivalencies per RCW [28A.700.070](#).



Bill McSherry
Vice President
Government Operations
Commercial Airplanes

The Boeing Company
P.O. Box 3707 MC 21-20
Seattle, WA 98121-2207

October 24, 2019

Washington State Board of Education
c/o Randy Spaulding, Executive Director
600 Washington Street
Olympia, WA 98504

Dear State Board of Education members and staff,

RE: Draft Rules for Graduation Pathways Option – CTE Pathway

I am writing to share The Boeing Company's concerns regarding the board's draft rules for Graduation Pathway Options following legislative adoption of House Bill 1599 and to recommend changes prior to final approval.

The Boeing Company strongly urges the board to reconsider proposed language regarding the career and technical education (CTE) graduation pathway. As proposed, the rule would permit students taking any two CTE credits to qualify for this graduation pathway, allowing for a mix and match of CTE courses from across different program areas (proposed rules WAC 180-51-230 (S)(h)). This means that a student could combine a credit in cosmetology with a credit in manufacturing and still meet the requirement of the graduation pathway. While that student would be able to "check the box" for graduation, they would not be prepared for work or postsecondary education or training in a related career field.

The clear intent of the statute is to enable students to "complete a **sequence** of career and technical education courses that are relevant to a student's postsecondary pathway, including those leading to workforce entry, state or nationally approved apprenticeships, or postsecondary education." The statute further defines that coursework as a "**sequenced progression of multiple courses** that are technically intensive and rigorous." (RCW 28A.700.030)

Since 2015, The Boeing Company has partnered with the Office of Superintendent of Public Instruction (OSPI) to support implementation of the Core Plus Aerospace curriculum. The two-year program that prepares students for high-demand jobs in advanced manufacturing is now in 40 high schools across the state. Through a **sequenced progression of courses**, students build industry-specific skills and competencies that open the door to a wide variety of postsecondary and career pathways. Since the program's inception, more than 600 Core Plus Aerospace graduates have been hired by The Boeing Company.

Allowing for a random mix and match of CTE courses to meet minimum graduation requirements will not ensure a level of preparation necessary for students to move on to work or postsecondary education and training. To the contrary, if enacted, the draft rules will compromise the ability of schools and districts to deliver meaningful CTE pathways that provide access to aligned employment and postsecondary education or training.

On behalf of The Boeing Company, I urge you to amend the draft rules to more specifically mirror the language in the bill and the reference to RCW 28A.700.030; eliminate the language permitting mixing and matching CTE courses; and require that CTE courses be a sequenced progression that meet the minimum criteria of CTE preparatory courses/programs, or the curriculum requirements of specified Core Plus programs, in order to meet the graduation requirement.

If you have questions, please feel free to contact me at william.mcsherry@boeing.com or 206-766-2610.

Sincerely,

Bill McSherry
Vice President, Government Operations
Boeing Commercial Airplanes



October 21, 2019

Randy Spaulding, Executive Director
Washington State Board of Education
600 Washington Street
Olympia, WA 98504

RE: Rules for Graduation Pathways Option - CTE

Dear Executive Director Spaulding;

I am writing to outline my concerns and those of Democrats for Education Reform (DFER) with the State Board's current draft rules for Graduation Pathway Options. We believe the proposed rules are inconsistent with HB 1599 passed by Legislature and signed by the Governor.

We are specifically concerned with the proposed language regarding the career and technical education (CTE) graduation pathway. The proposed rule would permit students taking **any** two CTE credits to qualify for this graduation pathway, allowing for a mix and match of CTE courses from vastly different program areas (see proposed rules WAC 180-51-230 (5)(h)). This allows a student to "check the box" for graduation purposes without preparing her/him/they for a family wage job or any meaningful postsecondary education path. We strongly believe this is inconsistent with the intent of HB 1599.

Our reading of HB 1599 outlines a clear intent to allow students to "complete a sequence of career and technical education courses that are relevant to a student's postsecondary pathway, including those leading to workforce entry, state or nationally approved apprenticeships, or postsecondary education." The statute further defines that coursework as a "sequenced progression of multiple courses that are technically intensive and rigorous." (RCW 28A.700.030)

The current proposed rule allows for the mix and match of CTE courses in order to meet minimum graduation requirements but does not ensure **true** level of preparation sufficient for a student to move on to a family wage job or postsecondary education. It provides a default pathway that allows students to graduate without being prepared for today's jobs or additional educational opportunities.

We encourage you to reconsider the current draft and advance rules consistent with the language in HB 1599.

Please contact me at 425 213-8019 or shirline@dfer.org with any questions.

Shirline Wilson, Washington State Director - **Democrats for Education Reform**

October 23, 2019

To: Washington State Board of Education

RE: HB 1599: Public Comment

As a High School Counselor, I feel that the implementation of HB 1599 has created a very disconnected approach for students to create a meaningful high school and beyond plan. While I know that HB 1599 had good intentions, it has made graduating from high school more complicated for students, parents and educators. My job as a school counselor is to support and help students graduate from high school. I want my students to leave high school with a good educational foundation and a post high school plan. It is difficult to help a student create a meaningful plan if we are concentrating our efforts on several different pathways to graduation. I would like to share some examples where this disconnection is currently happening for some of my students.

One of my students has a career pathway to attend the Paul Mitchell School in Spokane to be a cosmetologist. This student has not passed the Math ELA, has not taken AP/IB classes, and does not have a CTE pathway. She is good student, involved in our high school, and has a very viable career pathway. Her only alternative to the Math SBA would be to meet the ASVAB, SAT or ACT cut score. Going into the military is not this students career pathway. Why should she take the ASVAB? How can I make the ASVAB be a meaningful part of her high school and beyond plan? This student struggled in Algebra II but did really well in Chemistry. She chose Chemistry so she would have a solid understanding, for when she mixes and applies hair color. I was proud for her because she challenged herself, she knew this was a class that was going to benefit her. Yes, she could take the SAT and ACT, but why, she doesn't need to. We don't have a cosmetology CTE pathway. Why couldn't her pathway include Chemistry, along with other courses such as Personal Finance to help her become a cosmetologist and hopefully own or manage a salon.

We don't have CTE pathways for fine art, music or science. We wrongly assume that these students will go to four-year Universities. These students are left out and if they don't meet the cut score on the SBA then what? If a student wants to attend Edmonds Community College for music production and that is his pathway then why should he have to take the ASVAB, SAT or ACT or other alternatives, if it doesn't relate to his pathway? What happens if these students don't meet the ASVAB, SAT or ACT cut score, then what? How are these students supposed to feel? We do a lot of counseling around students feeling very low about themselves because they can't meet certain cut scores. These students are talented in many aspects that we do not test or have pathways for.

Another one of my students plans to attend Pima Medical Institute to be a Physical Therapy Assistant. She passed Algebra II but did not meet the Math SBA cut score. She has taken two years of Sports Medicine from our CTE department. I cannot count her two years sports

medicine as a CTE pathway because it doesn't articulate to a college as a tech prep credit. This student is currently taking a college prep English and Chemistry. All 4 of these classes will help her towards her pathway. She plans to take the SAT but what if she doesn't meet the SAT cut score to satisfy the Math SBA?

Students who take IB and AP classes will pass the SBA ELA and Math. This is not a viable alternative for students who do not meet the SBA cut score. We are very concerned with this option, these are the students who we want to take the SBA, but will opt out of taking the SBA. Only 40% of our school took the WCAS because it was not tied to graduation and they could opt out. Students in my district are already looking for ways to opt out of the SBA.

Lastly, our State is saying, students are not required to take the SBA to graduate. But we are expecting students to take the SBA, and we are still using the cut scores as a primary pathway to graduation. Why? Wouldn't it just be simpler to require all students take the SBA but not meet a certain cut score? Then create meaningful high school and beyond plans that include the SBA scores and encourage students to take courses that support their plan? We have a wonderful CTE department and offer many CTE classes, that should be a part of a high school and beyond plan. But we must also include non-CTE pathways for students who have career goals in the arts, humanities, and sciences. They should have equal opportunities to graduate.

I wish our graduation requirements were as follows:

1. Meet 24 credits
2. Student must take the SBA ELA and Math and WCAS. These scores can be used to help develop a high school and beyond plan and choose courses. Students do not need to meet a cut score to graduate.
3. Students must have a meaningful high school and beyond plan.

Please know, this is from my heart, I love my job as a high school counselor. I love the school district I work for. But I am frustrated for my students and I really want the State Board of Education and OPI to understand how complicated graduating from high school is due to HB 1599. I want to focus on solid and meaningful high school and beyond plans. The intentions of this house bill were good and change was needed. But, HB 1599 is not adding value to our student's education.

Sincerely,

Emily Elde

Emily Elde, School Counselor
Stanwood School District

Proposed language from Spokane, Portland, and Seattle MEPS:

Section - WAC 180-51-230 Graduation pathway options.

(5)The following are the eight graduation pathway options:

(g) Armed Services Vocational Aptitude Battery (ASVAB).

(i) Meet the AFQT standard on the Armed Services Vocational Aptitude Battery tests by scoring at least the minimum established by SBE for eligibility to serve in a branch of the armed services at the time the students takes the assessment.

(ii) The school must inform the students taking the Armed Services Vocational Aptitude Battery about the minimum eligibility score as set by the SBE.

(iii)This pathway does not require enlistment, communication with a military recruiter, meeting the physical or other additional requirements for military enlistment, or require students to release their scores to the military for purposes of recruitment.

(iii) Satisfying this pathway does not require students to meet the separate English and mathematics graduation pathway requirements of pathway options (a) through (f) of this subsection.

(iv) The school can choose 2 options for the release of information if desired. The first option allows for information release to military. (Schools may choose option 1-6 which allows for information release at specific times of the year. The school may also choose a second option, "Option 8" to not release any of the students' ASVAB scores for military recruitment. This is called the "split option" method for releasing students' ASVAB score. The split option allows the student to decide if he/she wants his/her ASVAB scores released to military recruiters for contact. A school administrator, teacher, or counselor must explain and offer the split option to the students on the day of the test.

(v) The school is encouraged to schedule an ASVAB Career Exploration Program Interpretation seminar after the test so students can participate in high school and beyond planning and learn about available military and non-military occupations they have an aptitude for.

(vi) The SBE will maintain a web page with information about this pathway, including information about the standard AFQT score for the state, test conditions, and test coordinator contacts. The SBE will post the eligible ASVAB AFQT score for each school year by (specify date, recommend September 1st annually)

(vii). Each testing tenth, eleventh, and twelfth grade high school student only has to meet that school years' ASVAB's minimum AFQT score for it to qualify as a graduation pathway option.



**Washington Association for Career and Technical
Education**

PO Box 315 • Olympia WA 98507-0315 • (T) 360-786-9286 • (C) 360-202-5297 •
(E) wa-acte@wa-acte.org
Tim Knue, Executive Director

To: State Board of Education Members and Staff

From: Tim Knue; Executive Director, Washington Association for Career and Technical Education

Date: October 22, 2019

I strongly request the SBE reconsider their proposed language regarding the Career and Technical Education (CTE) graduation pathway. The Washington Association for Career and Technical Education (WA-ACTE) board believes the proposed rules do not reflect the intention of the statute and weakens Washington's investments in meaningful CTE programming. As currently written the language exacerbates inequalities in Washington's educational system. For far too long vocational education was seen as a less than for students. The current proposed rules will return CTE to those days. With all the work in our state to leverage CTE for all students to become successful contributing members of society, the economy and life, this will result in a serious step back!

This approach is in direct conflict with the intent of the legislation, which was written to provide access to postsecondary training and education, careers, or apprenticeship through a "**sequenced progression**" of multiple courses that are technically intensive and rigorous" (RCW 28A.700.030). Allowing unrelated and unaligned CTE courses does not meet the definition of "sequenced progression" currently in statute and undermines our statewide efforts in CTE. Resulting in a lack of articulated access for students to employment and/or training after high school in a related field, thus defeating the purpose of the CTE Pathway.

Washington State is a national leader in Career and Technical Education. The changes anticipated in the proposed rules lowers the bar for CTE pathways, undermines the value of a strong CTE program, and would make Washington State one of the least rigorous states when it comes to CTE education, particularly at a time when every state is engaged in federal Perkins accountability planning. Further, these rules will negatively impact the work being done through Career Connect Washington, the Work Integrated Learning Advisory Committee (WILAC), and public-private programming across the state.

Finally, with Washington currently being a national leader in Career and Technical Education I am significantly concerned that creating a low bar for CTE Graduation Pathways exacerbates inequities for students of color, students with disabilities, and students from low-income communities. I have seen time and again the least rigorous, least powerful pathways become the default for many of these students—and that must change. Please do not take us back to the days of "tracking" students into vocational education! Our efforts in our K-12 laws, rules, policies, or practices should be geared toward maximizing postsecondary opportunities for ALL of Washington's students not minimizing one pathway vs. another.

I request you amend your draft rules to mirror the language in House Bill 1599 and the reference to RCW 28A.700.030. Specifically, eliminate the language permitting mix and matching CTE courses and require the CTE courses to be a true sequenced progression. The amendatory language for this section of the proposed rules which would accomplish this goal is found on the following page(s) of this letter.

h) **Career and technical education course sequence.** Complete a sequence of career and technical education courses.

(i) For this subsection, "sequence" is defined as: Two or more high school credits of career and technical education courses in a **sequenced** progression tailored to the student's goals and relevant to the postsecondary pathway(s) outlined in the student's high school and beyond plan. A student's sequence of career and technical education courses to satisfy this pathway (~~(may)~~) **must** be comprised of courses within the same career and technical education program ~~area or courses within more than one career and technical education program area, as determined relevant by the student's high school and beyond plan in consultation with school personnel.~~ A student's career and technical education course sequence (~~(may)~~) **must** include courses leading to workforce entry, state or nationally approved apprenticeships, or postsecondary education.

(ii) Satisfying this pathway does not require a student to take any courses that are part of a career and technical education preparatory program as described in RCW [28A.700.030](#).

(iii) Each sequence of career and technical education courses must include at least one course that meets the requirements in (h)(i)(A) or (B) of this subsection:

(A) The minimum criteria identified in RCW [28A.700.030](#):

(I) Either:

- Lead to a certificate or credential that is state or nationally recognized by trades, industries, or other professional associations as necessary for employment or advancement in that field; or

- Allow students to earn dual credit for high school and college through tech prep, advanced placement, or other agreements or programs;

(II) Be comprised of a sequenced progression of multiple courses that are technically intensive and rigorous; and

(III) Lead to workforce entry, state or nationally approved apprenticeships, or postsecondary education in a related field.

(B) The curriculum requirements of core plus programs for aerospace, maritime, health care, information technology, or construction and manufacturing.

(iv) Satisfying this pathway does not require students to meet the separate English and mathematics graduation pathway requirements of pathway options (a) through (f) of this subsection.

(v) A course that is used to meet graduation pathway requirements may also be used to meet credit subject area requirements, including career and technical education course equivalencies per RCW [28A.700.070](#).



**Washington Association for Career and Technical
Education**

PO Box 315 • Olympia WA 98507-0315 • (T) 360-786-9286 • (C) 360-202-5297 •
(E) wa-acte@wa-acte.org
Tim Knue, Executive Director

To: State Board of Education Members and Staff

From: Tim Knue; Executive Director, Washington Association for Career and Technical Education

Date: October 22, 2019

I strongly request the SBE reconsider their proposed language regarding the Career and Technical Education (CTE) graduation pathway. The Washington Association for Career and Technical Education (WA-ACTE) board believes the proposed rules do not reflect the intention of the statute and weakens Washington's investments in meaningful CTE programming. As currently written the language exacerbates inequalities in Washington's educational system. For far too long vocational education was seen as a less than for students. The current proposed rules will return CTE to those days. With all the work in our state to leverage CTE for all students to become successful contributing members of society, the economy and life, this will result in a serious step back!

This approach is in direct conflict with the intent of the legislation, which was written to provide access to postsecondary training and education, careers, or apprenticeship through a "**sequenced progression**" of multiple courses that are technically intensive and rigorous" (RCW 28A.700.030). Allowing unrelated and unaligned CTE courses does not meet the definition of "sequenced progression" currently in statute and undermines our statewide efforts in CTE. Resulting in a lack of articulated access for students to employment and/or training after high school in a related field, thus defeating the purpose of the CTE Pathway.

Washington State is a national leader in Career and Technical Education. The changes anticipated in the proposed rules lowers the bar for CTE pathways, undermines the value of a strong CTE program, and would make Washington State one of the least rigorous states when it comes to CTE education, particularly at a time when every state is engaged in federal Perkins accountability planning. Further, these rules will negatively impact the work being done through Career Connect Washington, the Work Integrated Learning Advisory Committee (WILAC), and public-private programming across the state.

Finally, with Washington currently being a national leader in Career and Technical Education I am significantly concerned that creating a low bar for CTE Graduation Pathways exacerbates inequities for students of color, students with disabilities, and students from low-income communities. I have seen time and again the least rigorous, least powerful pathways become the default for many of these students—and that must change. Please do not take us back to the days of "tracking" students into vocational education! Our efforts in our K-12 laws, rules, policies, or practices should be geared toward maximizing postsecondary opportunities for ALL of Washington's students not minimizing one pathway vs. another.

I request you amend your draft rules to mirror the language in House Bill 1599 and the reference to RCW 28A.700.030. Specifically, eliminate the language permitting mix and matching CTE courses and require the CTE courses to be a true sequenced progression. The amendatory language for this section of the proposed rules which would accomplish this goal is found on the following page(s) of this letter.

h) **Career and technical education course sequence.** Complete a sequence of career and technical education courses.

(i) For this subsection, "sequence" is defined as: Two or more high school credits of career and technical education courses in a **sequenced** progression tailored to the student's goals and relevant to the postsecondary pathway(s) outlined in the student's high school and beyond plan. A student's sequence of career and technical education courses to satisfy this pathway (~~(may)~~) **must** be comprised of courses within the same career and technical education program ~~area or courses within more than one career and technical education program area, as determined relevant by the student's high school and beyond plan in consultation with school personnel.~~ A student's career and technical education course sequence (~~(may)~~) **must** include courses leading to workforce entry, state or nationally approved apprenticeships, or postsecondary education.

(ii) Satisfying this pathway does not require a student to take any courses that are part of a career and technical education preparatory program as described in RCW [28A.700.030](#).

(iii) Each sequence of career and technical education courses must include at least one course that meets the requirements in (h)(i)(A) or (B) of this subsection:

(A) The minimum criteria identified in RCW [28A.700.030](#):

(I) Either:

- Lead to a certificate or credential that is state or nationally recognized by trades, industries, or other professional associations as necessary for employment or advancement in that field; or

- Allow students to earn dual credit for high school and college through tech prep, advanced placement, or other agreements or programs;

(II) Be comprised of a sequenced progression of multiple courses that are technically intensive and rigorous; and

(III) Lead to workforce entry, state or nationally approved apprenticeships, or postsecondary education in a related field.

(B) The curriculum requirements of core plus programs for aerospace, maritime, health care, information technology, or construction and manufacturing.

(iv) Satisfying this pathway does not require students to meet the separate English and mathematics graduation pathway requirements of pathway options (a) through (f) of this subsection.

(v) A course that is used to meet graduation pathway requirements may also be used to meet credit subject area requirements, including career and technical education course equivalencies per RCW [28A.700.070](#).



Dear State Board of Education members and staff,

We strongly request your organization's reconsideration of the SBE proposed language regarding the career and technical education (CTE) graduation pathway. We believe the proposed rules do not reflect the intention of the statute, will weaken Washington's investments in meaningful CTE programming, and will exacerbate inequalities in our education system.

The proposed rule would permit **any two credits of CTE** to qualify for this graduation pathway, allowing for a mix and match of CTE courses from across different CTE program areas (proposed rules WAC 180-51-230 (5)(h)). This means a student could combine a credit in cosmetology with a credit in welding and meet the requirement of this graduation pathway.

OSPI believes this is potentially in conflict with the intent of the legislation, which is to provide access to postsecondary training and education, careers, or apprenticeship through a "**sequenced progression** of multiple courses that are technically intensive and rigorous" (RCW 28A.700.030). While the flexibility proposed in the SBE rules may provide "flexibility" to students in regard to graduation and their High School and Beyond Plan (HSBP), it is not aligned with CTE program guidance and accountability and will create inconsistency and conflict with our CTE program.

A mix and match approach undermines having meaningful CTE pathways which provide real access for students to employment and/or training after high school in a related field. Completing a credit of cosmetology and a credit of welding may "check the box" for graduation, but it does not prepare a student for post-secondary success in health sciences and undermines our state-side efforts in CTE.

Having such a low bar for a CTE pathway undermines the true value of a strong CTE program and would make Washington state one of the least rigorous states when it comes to CTE education, not a national leader. The proposed rule will negatively impact the work being done through Career Connect Washington, the Work Integrated Learning Advisory Committee (WILAC), and public-private programming across the state preparing students for career pathways that are meaningful and meet the needs of Washington's Health Care System.

We are significantly concerned that creating this low bar for CTE Graduation Pathways will exacerbate, not solve, inequities for students of color, students with disabilities and students from low-income communities. We have seen time and again the least rigorous, least powerful pathways become the default for many of these students, and see no reason why it would be different this time around.

We request you amend your draft rules to more specifically mirror the language in the bill and the reference to RCW 28A.700.030, eliminating the language permitting mix and matching CTE courses, and requiring the CTE courses to be a sequenced progression. We have attached amendatory language for this section of the proposed rules which would accomplish this goal.

Sincerely,

WA HOSA-Future Health Professionals
Board of Directors
Saraya Pierce, Chair

October 23, 2019

WA State Board of Education

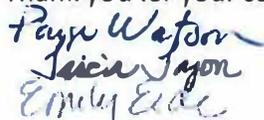
RE: Changes to Chapter 180.51
WAC—High School Graduation

On behalf of the Stanwood High School counselors, I am submitting formal comments in support of the draft rules as proposed by the State Board of Education regarding implementation of HB 1599 (Chapter 252, Laws of 2019).

As school counselors, we work closely with our students and their High School and Beyond Plan. The CTE Course Sequencing Graduation Pathway needs to be aligned with the classes we have available and our students' goals. We are the best ones to determine this, as some important courses may not be in the same CTE program area. For example, we have a student who plans to become a Pastry Chef. He has taken Culinary Arts along with Personal Finance, this will help him establish his own business in the future. Business English along with Horticulture is a pathway for students to prepare for work in the farming industry, being prepared to write a business plan can be a critical skill for their success. Another example is a student who plans a career in Photography. She has taken Photography and Accounting to prepare for her future. We have more examples, but we think this gives the State Board of Education reasonable examples of why we need to keep the CTE Course Sequence Pathway locally determined by the student's high school and their High School and Beyond Plan.

We also strongly believe that *one* of our jobs as counselors is to help students meet graduation requirements. With the implementation of 24 credits for graduation, Personal Pathways, a more robust High School and Beyond Plan and now these confusing and disjointed Pathways result in more time managing, documenting, and informing people of how a student can meet the requirements. This takes place *instead* of meaningful discussion and preparation toward their post high school goals. Basically, it seems like we're adding a complexity to graduation that, despite best intentions, is *not value added*.

Thank you for your consideration,



Paige Watson
Tricia Tayon
Emily Elde

24 October 2019

WA State Board of Education
RE: Changes to Chapter 180.51
WAC-High School Graduation

To All Concerned,

I would like to offer my input regarding former, current and future students that have elected or will hopefully elect to enroll in multiple CTE programs.

I am fortunate to have been an educator/instructor for the North Thurston Public School District for over 27 years. To this day I encounter former students on a regular basis and with enthusiasm will always refer to their time in Welding, Construction Skills or Auto. These former students are first responders, doctors, and welders. The common thread to all of these former students? Multiple CTE disciplines. This is called diversity. We value diversity in our schools. Even encourage it. That is why some students enroll in unlike classes such as Spanish III and AP Biology to fulfil college entrance requirements.

To this day I am amazed there are still decision makers that still look at CTE as a consolation prize for those not quite up to 4-year college standards. Not all students choose a 4-year path. They elect to join the workforce in the service industry. As a CTE instructor I have an obligation to guide my students throughout their high school career. There have been times where a student who loves welding finds out they are better working on automobiles and because of the continuity of CTE programs (Safety, Work Place Discipline, Service Above Self) the transition is nearly seamless.

Please allow every student the opportunity to be successful at whatever they choose to be.

As an Educator/Instructor for 27 years in the North Thurston Public School District I am submitting formal comments in support of the draft rules as proposed by the State Board of Education regarding the implementation of HB 1599 (Chapter 252, Laws of 2019)

Brian D. Stretch
North Thurston High School
Automotive Technology
ASE Accredited Program

10/23/19

WA State Board of Education

RE: Changes to Chapter 180.51 WAC-High School Graduation

As an educator in the Stanwood-Camano School District I am submitting formal comments in support of the draft rules as proposed by the State Board of Education regarding implementation of HB 1599 (Chapter 252, Laws of 2019).

My current title is On-Time-Graduation and I work part time with our comprehensive high school and part time with our alternative high school. I spend the vast majority of my day working with students who are struggling to meet the graduation requirements. When HB 1599 passed last year, we had high hopes that some of the pathways would benefit our struggling students.

In our comprehensive high school, we have have strong CTE program and the CTE pathway looks like a great opportunity for our students. It is vital that the rules surrounding the CTE courses allow for maximum flexibility which in turn allows students to explore multiple areas of interest. We have many students who try out classes in the Computer Science areas and then discover they have an aptitude for Welding. Or students who take a course in Medical Terminology and discover it's not quite for them but they excel in Financial classes. If the rules around the sequences of classes gets narrowed, we limit student choice at the very time they should be exploring different areas of interest to them. If the intent of HB 1599 was to support and encourage career pathways at the high school level, then forcing students into restrictive sequencing options for CTE classes will cut off all exploration. Students are already struggling to fit in all their credit requirements for graduation in our 6th period day.

In our alternative school, any restriction to the CTE sequencing will hurt our students who are struggling the most. There is not extra FTE in a small school setting to allow for CTE classes. Our alternative students are "allowed" to take CTE courses at the comprehensive high school if there is room and only after all other students have registered. It is already difficult to get students in the CTE classes that will benefit them after high school without additional restrictions being placed on our schools from the state level.

It is a real struggle to find pathways in an alternative high school setting (or any small school setting) that will benefit the students we work with. The very nature of small schools rules out AP classes, Dual Credit classes, and CTE classes. The one new pathway that might make a difference is the ASVAB. It is critical that SBE not make a higher threshold score than the military requires. It's my job to support students in meeting their graduation requirements, I encourage you to get to know the students and their struggles who would be affected by some of these changes.

Sincerely,

Rita Peterson
brennan.rita@gmail.com

October 23, 2019

To: Washington State Board of Education

RE: HB 1599: Public Comment

As a High School Counselor, I feel that the implementation of HB 1599 has created a very disconnected approach for students to create a meaningful high school and beyond plan. While I know that HB 1599 had good intentions, it has made graduating from high school more complicated for students, parents and educators. My job as a school counselor is to support and help students graduate from high school. I want my students to leave high school with a good educational foundation and a post high school plan. It is difficult to help a student create a meaningful plan if we are concentrating our efforts on several different pathways to graduation. I would like to share some examples where this disconnection is currently happening for some of my students.

One of my students has a career pathway to attend the Paul Mitchell School in Spokane to be a cosmetologist. This student has not passed the Math ELA, has not taken AP/IB classes, and does not have a CTE pathway. She is good student, involved in our high school, and has a very viable career pathway. Her only alternative to the Math SBA would be to meet the ASVAB, SAT or ACT cut score. Going into the military is not this students career pathway. Why should she take the ASVAB? How can I make the ASVAB be a meaningful part of her high school and beyond plan? This student struggled in Algebra II but did really well in Chemistry. She chose Chemistry so she would have a solid understanding, for when she mixes and applies hair color. I was proud for her because she challenged herself, she knew this was a class that was going to benefit her. Yes, she could take the SAT and ACT, but why, she doesn't need to. We don't have a cosmetology CTE pathway. Why couldn't her pathway include Chemistry, along with other courses such as Personal Finance to help her become a cosmetologist and hopefully own or manage a salon.

We don't have CTE pathway's for fine art, music or science. We wrongly assume that these students will go to four-year Universities. These students are left out and if they don't meet the cut score on the SBA then what? If a student wants to attend Edmonds Community College for music production and that is his pathway then why should he have to take the ASVAB, SAT or ACT or other alternatives, if it doesn't relate to his pathway? What happens if these students don't meet the ASVAB, SAT or ACT cut score, then what? How are these students supposed to feel? We do a lot of counseling around students feeling very low about themselves because they can't meet certain cut scores. These students are talented in many aspects that we do not test or have pathways for.

Another one of my students plans to attend Pima Medical Institute to be a Physical Therapy Assistant. She passed Algebra II but did not meet the Math SBA cut score. She has taken two years of Sports Medicine from our CTE department. I cannot count her two years sports

medicine as a CTE pathway because it doesn't articulate to a college as a tech prep credit. This student is currently taking a college prep English and Chemistry. All 4 of these classes will help her towards her pathway. She plans to take the SAT but what if she doesn't meet the SAT cut score to satisfy the Math SBA?

Students who take IB and AP classes will pass the SBA ELA and Math. This is not a viable alternative for students who do not meet the SBA cut score. We are very concerned with this option, these are the students who we want to take the SBA, but will opt out of taking the SBA. Only 40% of our school took the WCAS because it was not tied to graduation and they could opt out. Students in my district are already looking for ways to opt out of the SBA.

Lastly, our state is saying, students are not required to take the SBA to graduate. But we are expecting students to take the SBA, and we are still using the cut scores as a primary pathway to graduation. Why? Wouldn't it just be simpler to require all students take the SBA but not meet a certain cut score? Then create meaningful high school and beyond plans that include the SBA scores and encourage students to take courses that support their plan? We have a wonderful CTE department and offer many CTE classes, that should be a part of a high school and beyond plan. But we must also include non-CTE pathways for students who have career goals in the arts, humanities, and sciences. They should have equal opportunities to graduate.

I wish our graduation requirements were as follows:

1. Meet 24 credits
2. Student must take the SBA ELA and Math and WCAS. These scores can be used to help develop a high school and beyond plan and choose courses. Students do not need to meet a cut score to graduate.
3. Students must have a meaningful high school and beyond plan.

Please know, this is from my heart, I love my job as a high school counselor. I love the school district I work for. But I am frustrated for my students and I really want the State Board of Education and OPI to understand how complicated graduating from high school is due to HB 1599. I want to focus on solid and meaningful high school and beyond plans. The intentions of this house bill were good and change was needed. But, HB 1599 is not adding value to our student's education.

Sincerely,

Emily Elde

Emily Elde, School Counselor
Stanwood School District

October 23, 2019

TO: Simone Boe

FROM: Jan Bullock
Counselor
WestSide High School
Wenatchee WA 98801
509-663-7947
bullock.j@wenatcheeschools.org work
jandjbullock@gmail.com personal

RE: CTE Courses meeting state standards for Math Assessment

I am a counselor at WestSide High School in Wenatchee. We are an alternative high school and I am assigned to seniors. My role in the past years has been to assure that graduating seniors have met all state requirements for graduation. Meeting the math state requirement has been a particular challenge as it has been a moving target. The requirements change yearly making counseling students a challenge. For example, we had students who met standard on the EOC math test, only to get to their senior year to find out that it didn't count for that graduation year.

We have a talented math team who have mastered skills in teaching students with gaps in learning and who lack confidence in mastering math. We are committed to high standards and want all of our students to be prepared for post high school college and career opportunities. We are crippling our teachers with the changing requirements and testing. It seems that each time they figure out the best way to help students master the skills to pass a state requirement, the rules or the tests change, creating a barrier to graduation.

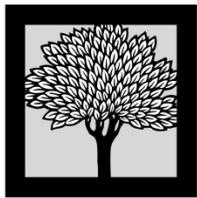
This year has been especially challenging because of the new pathways offered. I have not been able to clearly coach students and teachers on meeting the math requirement if they have attempted but not passed the Smarter Balanced Math Assessment. It's like standing in the forest with several paths to choose from, but not knowing the obstacles of each path. The current situation is threatening our high standards and it is not clear. Students have a difficult time setting goals because of the lack of understanding of the courses and what they entail and if they will meet standard based on the teachers' certification. We are in a situation that has created confusion and frustration. Being a small school with limited resources, much like many of our rural schools, creates even more barriers. My students, like many, are already facing stressful challenges and lack self-confidence. This adds additional burdens to their plates.

In past years, we have had processes that worked for students and teachers. They all had to work hard, but it was inspiring to see students and teachers meet the challenges and master math skills at high standards. The COLLECTION OF EVIDENCE was very successful in maintaining high standards and having students master necessary math skills. This option was removed from the pathways. The removal has set us back and has us scrambling to find solutions. The solutions offered are blurry. The CTE pathway is not clear and will have students learning skills, but not from our best and most trained Math teachers.

We need clear, simple pathways. If the CTE pathway is used, it needs to be clearly defined. Adding the Collection of Evidence back as an alternative would simplify our tasks and give time for teachers to teach and students to master meaningful, rigorous math skills.

I appreciate your time and consideration. Please contact me for any clarification or questions.

Sincerely,
Jan Bullock



WEA
WASHINGTON
EDUCATION
ASSOCIATION

Larry Delaney, President
Janie White, Vice President
Armand Tiberio, Executive Director

32032 Weyerhaeuser Way S.
Federal Way, WA 98003
mailing address: P.O. Box 9100
Federal Way, WA 98063-9100
telephone: 253-941-6700
toll free: 800-622-3393
fax: 253-946-4692
www.washingtonea.org

October 25, 2019

WA State Board of Education
rulescoordinatorSBE@k12.wa.us

RE: Changes to Chapter 180.51 WAC | High School Graduation

On behalf of the members of the Washington Education Association I am submitting formal comments in support of the draft rules as proposed by the State Board of Education regarding implementation of HB 1599 (Chapter 252, Laws of 2019).

We appreciate the time, thought and information-gathering the State Board has undertaken to write these rules. Our educators, who work with students daily, believe that the rules as currently drafted best support students in our state goal to ensure all students are college or career ready.

The Armed Services Vocational Aptitude Battery (ASVAB) Pathway and the Career and Technical Education Pathway are two new options in high school graduation. We appreciate that the rules, as written, maintain high standards and local flexibility consistent with a student's high school and beyond plan.

WEA would like to specifically address the Career and Technical Education subsection.

Career and Technical Education (CTE) Pathway

WEA believes the proposed rules do support Office of the Superintendent of Public Instruction (OSPI) goals as shown on their CTE webpage: CTE for students to *"explore careers in middle and high school, especially careers in high-demand, high-growth fields such as healthcare and green technologies."* The proposed rules allow students to follow a sequence that leads to a certificate and allow for two credits from different strands of CTE to qualify for this graduation pathway. This does allow students to experience more than one CTE course from different program areas, thus exploring a variety of career possibilities and preparing for careers that are inter-disciplinary in nature. (Proposed Rules-WAC 180-51-230 (5)(H)).

WEA firmly believes the SBE rules are well thought out, set a high bar for graduation pathways and allow for local, student-centered flexibility. The rules allow for local control and student decision making over the courses a student takes to fulfill the CTE pathway based on the student's High School and Beyond Plan and the schools ability to offer specific courses.

While a sequence that leads to a certificate may be the ideal and what we all strive for with most students, it does not work for every student who accesses this pathway nor is it available in every school as the examples below describe:

- Students who move from one district to another and find the sequence they are pursuing is not available in their new district would also not graduate. Students who are mobile during the 11th or 12th grades may be adversely impacted by a policy that would mandate a sequence with no alternative.
- A student may decide to take a course in personal finance or accounting and a course in agriculture to be prepared for their family business. That student's High School and Beyond plan should be used as a guide to determine if the student is following a path to be career ready. A stricter rule interpretation, one that would only allow for a sequence of courses to count toward the pathway, would either prevent the student from receiving a high school diploma or from developing a program that meets their individual needs.
- Or, a student could explore a class in finance, discover they are not interested, and then take an Information Technology course discovering they love it. If the draft rules are not accepted, this example would also prevent a student from receiving their high school diploma.
- Lastly, many alternative high schools and some smaller school districts, indicate they are not able to offer multiple sequences of CTE courses. [Example from Stanwood.](#)

If our state goal is to ensure all students be career and college ready, and students have met all other graduation requirements, withholding a diploma definitively harms these students regarding their future endeavors. Therefore, we strongly support the State Board of Education's proposed rules.

In closing, WEA believes that only counting a sequence of courses in the same CTE program for graduation is too narrow and creates inequity between large and small school districts.

Thank you for your thoughtful consideration of this important decision.

Sincerely,



Simone Boe
WEA Policy Lobbyist
360-402-4283
sboe@washingtonea.org

To the State Board of Education:

I write to you today to express my support of the rules suggested by the State Board of Education, and my opposition to the changes being suggested during public comment, regarding the graduation pathways outlined in HB 1599.

I was one of many teachers who testified in support of removing the barrier to graduation that is the SBA exam --- specifically, the math SBA. The test is well intentioned but poorly crafted --- a fact that I know well, considering that I was asked to write questions for it on 3 separate occasions, and each time came away knowing that the basic format was flawed.

In my 24 year career as a math teacher, I have written test questions for every one of the math tests that Washington State has used --- the MSPs, the EOCs, the COE in all its iterations, the EOC Exit exams, the SBA, and even the WA-AIM. Each time, I was unimpressed by the test's ability to measure whether or not a student could join society as a functioning adult who can do a useful job. "Useful" encompasses an extraordinarily broad range of skills, and a test can see only a narrow portion of that range.

When HB 1599 was first proposed, I was excited about the way that it incorporated a variety of ways to demonstrate "usefulness". The math SBA is much more focused on college-bound students than anything else. And certainly, society benefits when a student goes to college to become a teacher, a lawyer, a doctor, or any of the occupations that college prepares people for... but society also benefits when students take over a family business using knowledge gained in their CTE classes and when students enter the armed forces. A graduation pathway that honors these students' choices is just as valuable as a pathway that includes a college-entrance-style exam.

That's why I appreciate the rules the SBE has written that allow for local and student flexibility, and why I was surprised to hear the opposition during public comment.

I appreciate that the SBE has written the rules around the ASVAB to allow for the minimum score on the AFQT portion to qualify towards graduation. A high school diploma is a way to say to the world "this person knows enough to be useful." So if a student's ASVAB score is high enough to prove to any branch of the military that they would be useful, then why are other people not content with that judgment? Are we really going to argue that the ASVAB doesn't measure what the military wants it to measure? Besides, the minimum score to enter each branch --- which is actually the AFQT score, a subset of the ASVAB score that is calculated separately --- can change without advance notice, based on military staffing needs. That kind of uncertainty will not clarify a student's potential usefulness to society. In addition, the ASVAB was designed, at least in part, to help decide which branch of the military would best suit a student's aptitudes. To make a student choose the branch first is contrary to that purpose. So why do the opponents to the rules as written want to force students to choose a specific branch of the military, and then see if their ASVAB scores measure up?

In other words: the law says we should use the ASVAB, so let's use the ASVAB as it was designed to be used --- with the parts that comprise the Armed Forces Qualifying Test broken out and calculated as prescribed, and then compared to each branch's cut off score, and if the student qualifies for any of the

branches, then they've "passed". They have proven their usefulness to society and are eligible to graduate.

The rules that the SBE has outlined for HB 1599 clearly says:

*A student's sequence of career and technical education courses to satisfy this pathway may be comprised of courses within the same career and technical education program area **or courses within more than one career and technical education program area, as determined relevant by the student's high school and beyond plan** in consultation with school personnel.*

I appreciate the clarity of this rule and the flexibility it provides to students.

Let's consider those students who need to "mix and match" CTE classes in order to get the right background for the career they want. If I take horticulture and personal finance because I'm going to take over my family's farm, then that combination is exactly what I need for my career pathway. OSPI can't hold it against me that my career doesn't fit into a single program. These classes are relevant to my High School and Beyond Plan and therefore I have met the graduation requirement.

Let's also consider what "relevant" would mean in a situation like this:

I take accounting, because I'm good at math and it's a possible career for me. I pass the class, but hated everything about it. But then I take a computer coding class, because I'm good at math and it's a possible career for me. I pass the class, and I love everything about it, so I decide to become a video game designer.

Clearly, the coding class is relevant to my choice of careers. **But so was the accounting class because it taught me that I didn't want a career as an accountant.** Therefore, both classes are relevant to my High School and Beyond Plan, and I have met the graduation requirement.

In other words: OSPI can't dismiss the importance of a student's High School and Beyond Plan, nor assume that all students fit neatly into a single program area --- and nor should they try.

Furthermore, the League of Education Voters is wrong in saying that HB 1599 will "water down the graduation requirements" for Washington's students or that the graduation requirements are not "meaningful and rigorous". First of all, the rigor is guaranteed by the credit requirements, not the tests, and always has been. Secondly, these rule changes make the graduation requirements more meaningful, not less, because now they will be tailored to match the students' individual High School and Beyond Plan.

I am asking you to implement the pathways outlined in HB 1599 as written in the rules as they currently stands. To do otherwise is to deny students the opportunity to show us where they truly shine and how they can best demonstrate their usefulness to the world.

Sincerely,

Andrea Hicklin



October 17, 2019

Washington State Board of Education,

Thank you for the opportunity to submit public comment on proposed WAC 180-51-115. This comment focuses on the portion of the draft rules that allows students with an individualized education program (IEP) to be exempted from state graduation requirements in WAC 180-51-115. I oppose this exemption. If adopted, it would essentially create a “modified diploma” under federal law – a lesser credential for students with disabilities that is not fully aligned to state standards and cannot be counted in graduation rate calculations. The proposed exemption in WAC 180-51-115 is also bad policy for other reasons, not least of which is its likely effect on educational outcomes for students with disabilities. For the following reasons, the words “or exempted” should be deleted from the second sentence added by the proposed amendment to WAC 180-51-115.

1. Exemption or Reduction of State Graduation Requirements Based on Disability is Contrary to Federal Law

Under the Individual with Disabilities Education Act (IDEA), students with disabilities have an IEP team, which identifies the special education services and accommodations needed for the student to access and progress in the core curriculum (i.e., Washington’s K–12 Learning Standards). The Every Student Succeeds Act (ESSA) also requires that states adopt one set of standards for all students, except for students with the most significant cognitive disabilities participating in the alternate assessment (i.e., WA-AIM), generally less than 1% of the total student population.¹

ESSA continues on to define a “regular high school diploma” as “the standard high school diploma awarded to the preponderance of students in a State that is fully aligned with the State’s standards and does not include a general equivalency diploma, certificate of completion, certificate of attendance, or any other similar or lesser credential, such as a diploma based on meeting Individualized Education Program (IEP) goals.”²³ With the sunset of the Certificate of Individual Achievement (CIA) option, the graduation pathways in the 2019 legislation meet these federal requirements of a regular high diploma, as they are available to all students in the

¹ 20 U.S.C. §6311(b)(1)(B); 34 C.F.R. §200.1(a)-(c).

² ESEA 20 U.S.C. § 7801(43) and <https://www2.ed.gov/policy/elsec/leg/essa/essagraterguidance.pdf>

³ IDEA also defines “regular high school diploma” in 34 CFR 300.102(a)(3)(iv).

state, and students with an IEP may have accommodations that support their attainment, without lowering the standards.

ESSA also describes how states may calculate and report graduation rates used in the state's improvement plan. Diplomas other than the regular high school diploma may not be included in the calculation of the graduation rate at the district or state levels.⁴

The proposed rule, which allows for an IEP to exempt the student from state graduation requirements, would permit a lesser credential, essentially a "modified diploma." A modified diploma may not be included in the graduation rate calculations. Nor would a modified diploma terminate the student's eligibility to continue to receive special education services, as does a regular high school diploma.⁵

The United States Department of Education has confirmed this. According to the Department's Office of Elementary and Secondary Education (OESE), ESSA defines a "regular high school diploma" as the standard high school diploma awarded to the preponderance of students in a State that is fully aligned with the state's standards and does not include a general equivalency diploma, certificate of completion, certificate of attendance, or any other similar or lesser credential, such as a diploma based on meeting IEP goals. If Washington adopts a rule allowing IEP teams to exempt students with disabilities from graduation requirements and still receive a regular high school diploma, students who receive a "regular" diploma by virtue of exemption from graduation requirements will not have actually received a regular diploma that is aligned to state standards because their IEP teams will have exempted them from those standards; thus, they would receive it on the basis of a lesser credential. Therefore, according to the Department, these students may not be counted in the numerator of the state's Adjusted Cohort Graduation Rate, but must be counted in the denominator.

2. It Does Not Consider the Diversity of Students with Disabilities or Their Ability to Meet Graduation Requirements with Support and Accommodations

Washington State has more than 140,000 students with disabilities ages 3–21 who are eligible under the IDEA and are served with an IEP. Most of these students are identified with mild/moderate disabilities, such as in the category of specific learning disability (SLD), speech language impairments, other health impairments, or emotional disturbances. Research has shown that 85–90% of students with disabilities can meet the graduation standards targeted for all other students, *if* they receive the specially designed instruction and appropriate access, supports, and accommodations, through their IEP.⁶ With the changing graduation requirements,

⁴ <https://www2.ed.gov/policy/elsec/leg/essa/essagradrateguidance.pdf> at page 13.

⁵ 34 C.F.R. §300.102(a)(3)(i) and (ii).

⁶ <https://www.achieve.org/files/Achieve%20-%20NCEO%20-%20Graduation%20Requirements%2013Nov2013.pdf>

it is imperative that school districts and IEP teams offer additional supports to ensure students with disabilities are successful.

3. It Negatively Impacts Washington State Post-Secondary Outcomes and Economics

Washington collects post-school outcomes data from students with disabilities one year after they leave school. The purpose of this data collection is to measure the outcomes of these students, as required under IDEA's mission to increase post-school education, employment, and independent living. The latest results, collected during 2017–18 for students leaving school in 2016–17, detail that 27.8% had no engagement with post-secondary education, training, or employment⁷. Ensuring that students with disabilities leave high school with the skills needed for post-secondary education or employment success may only be accomplished through long-term planning and provision of special education services and accommodations, along with access and instruction in grade-level core standards. Exemption from these requirements is contrary to ensuring students graduate college and career-ready.

4. It is Contrary to State Policy and Priorities for Improved Educational Outcomes

The data are clear: there is an opportunity gap for students with disabilities in graduation rates and academic achievement and growth. My vision is to prepare every student who walks through public school doors for post-secondary aspirations, careers, and life. The Washington Legislature has also prioritized improving the outcomes of students with disabilities, through policy legislation as well as through additional funding to support services for students with disabilities. OSPI, school districts, parents, and communities are actively engaged in improvement efforts, addressing inclusion, access to effective core instruction, and increasing opportunities for professional development in areas such as universal design for learning (UDL), standards-aligned IEPs, co-teaching, and evidence-based instruction.

I respectfully request that the State Board of Education delete the words "or exempt" from the proposed rule amendment. This deletion would acknowledge that students with disabilities in Washington state are able to meet graduation requirements and should receive appropriate services and accommodations to support their success, rather than reducing the requirements and issuing a modified diploma that does not ensure college and career readiness.

Sincerely,



Chris Reykdal
Superintendent of
Public Instruction

⁷ <https://www.seattleu.edu/ccts/post-school-outcomes/>

Good morning--

My name is Roz Thompson and I am the Director of Government Relations for the Association of Washington School Principals.

Thank you for the opportunity to give public comment regarding the rules for graduation requirements. This is getting massive attention across our state because graduation is a massive undertaking in our schools and principals do not take this lightly.

It is our primary goal as an education system to grow and develop our children into young adults who are prepared for their future. HB 1599 achieves this through three important parts--ensuring students have a robust high school and beyond plan, having rigorous coursework to earn 24 credits, and now meeting the requirements of one of eight pathways to show that students are ready for something after high school. The complexity of each of these parts is tremendous and schools have worked hard for the past ten years to continually adjust to the ever changing demands of graduation requirements. Principals, counselors, and teachers continue to work on this every day in their buildings and want the absolute best for each and every student.

Our Associate Director, Scott Friedman, attended the last State Board meeting and gave you detailed feedback about several parts of the graduation requirements. He and I revised our last letter to you and will submit that as part of our feedback. In that letter, Scott writes that he has had conversations with almost 250 high school principals and assistant principals in our state. Some of the most common questions and concerns we hear have to do with clarifying letter grades, credits earned in middle school, and the ASVAB.

But far and away, the biggest topic we hear about has to do with the CTE pathway. And I think this means we have a great opportunity. We have an opportunity to elevate the discussion of CTE and to help people understand the complexity and significance of these programs and to understand what all of the terminology means--programs of study, sequence, pathways, clusters, etc... This is not an "and"/"or" moment. We need to ensure that students have robust CTE programs of study that are engaging and interesting to them and that are staffed with fabulous teachers. And, in the event that a student needs to pivot and make a different choice, and rewrite their HSBP, we need to allow for this. Choice for any human being is critical to engagement and choice in this case is critical for adolescents who are trying to think about what they want to engage in in their future.

If you were in a room with a group, large or small, of high school principals, the topic of high school graduation requirements would have them talking passionately for hours. As you can imagine, there are varying opinions. You will hear varying opinions today and through written comments. But there are three things principals always agree on: they will work hard to bring

hope to all students, they care about high expectations for all students, and they need flexibility in their roles. And in the case of graduation requirements, that is no exception. Principals are asking for as much flexibility as possible in order to meet the needs of each of their students.



Black Education Strategy Roundtable

33530 1st Way S. Suite 102 · Federal Way, WA 98003
253.237.0775 · www.besrwa.org

October 23, 2019

Washington State Board of Education
c/o Randy Spaulding, Executive Director
600 Washington Street
Olympia, WA 98504

Dear State Board of Education members and staff,

The Black Education Strategy Roundtable remains concerned regarding the Board's draft rules for Graduation Pathway Options. We believe the current language on the Armed Services Vocational Aptitude Battery (ASVAB), dual credit and the career and technical education pathways undermines the quality and rigor of the high school diploma for Black students, once again leaving too many of our students ill-equipped and underprepared for their postsecondary endeavors. We recommend changes to the rules prior to final approval.

As addressed in September 6, 2019, joint letter with other organizations, the legislation language on the ASVAB pathway option is vague and without clear intent. Information we have received from military leaders and recruiters suggests that "by scoring at least the minimum established by the military for eligibility to serve in a branch of the armed services at the time the student takes the assessment", is a very low academic expectation. We recommend that the ASVAB score is linked to the score required for the job(s) and branch of the armed services identified in a student's high school and beyond plan.

Earning college credit while in high school results in improved postsecondary degree attainment. The legislation for this pathway clearly states the student must complete and qualify for college credit in the dual credit course. Only a college or university can determine if the student has met the qualification requirement. The current draft rules language is focused only on high school credit. We recommend that the dual credit language complies with the intent of the legislation that student must qualify for college credit.

Finally, the legislative intent for the career and technical education pathway is very clear in requiring a sequence of courses. This coursework is defined in statute as a "sequenced progression of multiple courses that are technically intensive and rigorous." (RCW 28A.700.030) Allowing for mix and match CTE courses, as proposed in the current draft rules, will not prepare a student for preparation leading to re-preparation for workforce entry or earning a credential.

Sincerely,

Steve Smith
Executive Director
Black Education Strategy Roundtable

October 22, 2019

Linda Drake
Director of Career and College Ready Initiatives
Washington State Board of Education

Dear Linda:

We applaud the State Board of Education for their continued willingness to accept input regarding the rules around the implementation of HB 1599. The openness with which the board is addressing the process should be commended and know that we appreciate the opportunity to share what we have learned from high school principals from across the state.

In gathering input we wanted to be both expansive and far-reaching. We were intentional about hearing the voice of small school principals and those serving in rural communities as well as those in large metropolitan areas. Members of our staff attended league meetings, video conferenced with groups of principals, chatted via speaker phone, and hosted HB 1599 meetings. All told the input we are sharing comes from a little over 250 high school principals, some of which also have the dual duty of being the CTE Director for their school/district.

Prior to sharing the feedback from our meetings, it is also important to share other points that were made during our discussions. It was evident from the outset that principals are working hard to ensure all students have a rigorous academic path to earn their diploma. Systems involving counselors, teachers, and parents/guardians have been created to create meaningful educational experiences and challenges that help students think about and prepare them for what comes after high school. Principals consistently talk about their high expectations for students and do not treat graduation requirements lightly. Conversations with principals focused on how students could attain the highest level possible so that students were ready for something after high school. Discussions also spoke to the need for flexibility/choice in regard to options for students that maintain rigor, but also provide a sense of hope for a student. It is hope that keeps someone moving forward and getting one step closer to graduating. Lance Balla from Everett High School stated it best when he said, "The more we delimit choice, the more we harm our most vulnerable students."

Detailed below is the information we learned from conversations with principals.

- Be clear about what a passing grade is for dual credit classes. For example, if someone earns a "D" in a course, which is a passing grade, principals want assurance this would fulfill the dual credit requirement.
- Clarity around what grade is needed in transition classes in order to get into college/advanced level courses. Is it a B or something else? It is always difficult to use grades as a true indicator of

knowledge. Primarily due to the fact that any A, B, C, D, F grade can mean so many things at different schools. We wish there was consensus in the field about what it should be, but people are all over the place. Some advocate for A or B, while others share stories of students that earn a C, but a teacher or counselor sees potential in them and talks them into an AP class where they suddenly become challenged and engaged. Once this happens their grades increase and they pass the AP exam.

- There is a lot of conversation around the C+ criteria for AP and IB courses. The first is that if a C+ is good for AP and IB shouldn't it also work for College in the HS and/or Running Start classes? The second part that is causing lots of discussion is that some schools have gone away from having + or - as a part of their grading system. They only have whole letter grades (A, B, C, D, F). Having a C+ requirement creates inequity among students around the state in regard to this option. We have shared just what you have said regarding the statute. Specifying a grade puts a lot of pressure on the system. Our hope is that there could be a recommendation from the SBE so that the legislature looks into modifying this statute this upcoming session.
- Students meeting standard through ASVAB should have the same conditions as students that meet standard through AP or SAT exams. Currently they are required to do extra work through their High School and Beyond Plan (HSBP) that AP or IB are not asked to do. Many times a student is looking at multiple branches. Of course, they could list them all, but AP/SAT folks don't need to list all their college choices or potential majors.
- There is increasing concern around high school coursework taken in middle school and the automatic transfer to high school transcripts. Principals in the Bellevue and Mercer Island school districts recently contacted us to ask how districts are working through this process. They are advising students to **not** consider transfer of credit until their junior year because grades might affect their GPA in a negative way, and they may wish to retake the course in high school. We understand that once the credit is transferred it cannot be taken off the transcript. Having the option for parents/guardians to post the grade(s) is something that would be beneficial. Many students and families would like to have that option, especially if the grade was something they didn't want on their transcript. Currently once grades on are a transcript it cannot be altered or deleted. *If this is not the case, then this needs to be explained to districts and schools.* With greater emphasis on the HSBP, and the need for increased parent/guardian/student input into educational decisions, it is important to write rules for this section that are flexible so that students have options.
- The largest portion of discussion among principals was in regards to the CTE pathway. Many principals shared that this pathway had the potential of creating inequitable opportunities for students across the state. They readily acknowledge the rigor of CTE coursework and understand the course approval and framework process. They recognize the opportunities that CTE coursework provides students and also know the value of the programs in their schools. However, they also recognize the dramatic differences in CTE course options and programs of study across the state. They know that students may need options to help keep them progressing through school. They want students to have the freedom to try different classes. Students want this as well. With the emphasis on the HSBP to act as the guide for a student's educational aspirations, principals can ensure that the courses they take locally meet this plan. If a student shares they want to do "X", and the school affords them the opportunity to enroll in two credits of CTE coursework from the same

program of study that is the best-case scenario. However, in the event that a student tries “X” and then wants to switch to “Y”, this should be acceptable and documented in their HSBP. This ensures they continue to receive rigorous coursework and an appropriate academic challenge that prepares them for their post-secondary interests, but it doesn’t eliminate an option for them to meet standard in one of the pathways.

Thank you for your consideration and allowing the large number of educational stakeholders to provide input on this important decision. Please reach out if there is anything else you need.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Friedman". The signature is fluid and cursive, with the first name "Scott" being more prominent than the last name "Friedman".

Scott Friedman
Associate Director

A handwritten signature in black ink, appearing to read "Roz Thompson". The signature is fluid and cursive, with the first name "Roz" being more prominent than the last name "Thompson".

Roz Thompson
Director of Government Relations and Advocacy

October 28, 2019

State Board of Education
600 Washington Street SE
P.O. Box 47206
Olympia, WA 98504
rulescoordinatorSBE@k12.wa.us

RE: Rule-making on Graduation Requirements

Dear State Board of Education:

Thank you for sending Peter Maier and Holly Koon to explain the proposed changes in the high school graduation requirements to the 41st annual Washington State PTA Legislative Assembly on Sunday, October 27, 2019. I appreciate the variety of choices the State Board of Education (SBE) is considering to meet the pathway to graduation requirement. As an education and child advocate through Washington State PTA for more than a decade, my primary concern is that all children have the greatest flexibility to complete graduation requirements and graduate from high school.

The K-12 school system's ultimate goal is to enable children to graduate with a high school diploma and be prepared to take their next steps in life. Attaining other benefits in high school, such as college credit or technical certification, are icing on the cake.

The AP coursework option and five of the options you explained give students great flexibility in completing the pathway graduation requirement in a timely and relatively low-stress manner. For example, students in the AP/IB/Cambridge curriculums have a variety of classes from which to choose all four years. However, the two-year sequence of two CTE courses has the potential to create a high stakes barrier to graduation. Washington State PTA traditionally has spoken in favor of student progress evaluation and graduation requirements that are not high stakes.

My husband and I have three sons who attended public schools in Lake Washington School District. Our first two sons graduated from high school in 2014 and 2018. Our first graduated from the United States Military Academy at West Point, NY. Our second son attended a state university but decided to work instead. Our third son is a senior in the Cambridge Program at Juanita High School in Kirkland. Our first two sons took AP classes, including advanced mathematics and English, which would have met the proposed pathway graduation requirement. Our third son has completed Cambridge courses in grades 9th-12th and will graduate in 2020. Through AP and Cambridge, all three of our sons took classes their junior year or earlier, which meant they would have had at least one extra year (senior) to complete the proposed pathway requirements if an earlier class had proved too challenging.

The primary goal of the CTE class sequence should be to meet the English and math pathway graduation requirements. The proposed CTE sequence of courses is less flexible than some coursework options like AP classes and is therefore less equitable. Within the CTE sequence offering, the options should be so broad as to allow students to complete two courses, regardless of whether those courses lead to or

result in an advanced certification beyond the high school diploma or not. Expecting teenagers to know what their career path is in high school is not realistic. My two older sons had hopes and plans for after high school graduation, but their plans changed. It is extraordinary to expect the dreams of a 15-year-old to materialize into fruition when she is 19-24 years old.

High school graduation is one of the best insulators children have in the job market. In data compiled by Statista, Inc., from 2000-2018, in all but two years students who did not graduate from high school had a higher unemployment rate than students who did graduate. This was especially true during the Great Recession. See Figure 1.

Society > Economy

Unemployment rate of high school graduates and dropouts not enrolled in school in the United States from 2000 to 2018

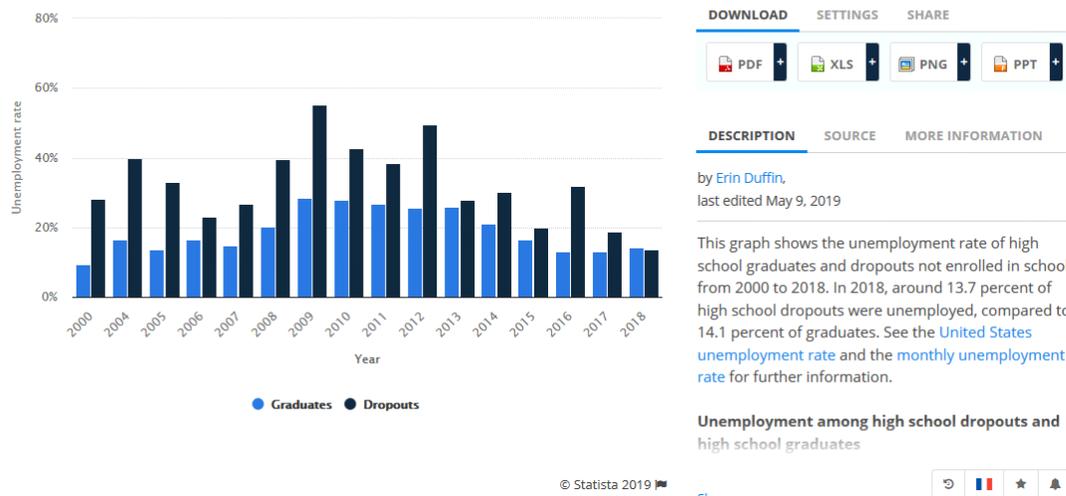


Figure 1: Chart comparing unemployment rates of high school graduates versus high school students who did not graduate. Source: Statista. "U.S. High School Graduates and dropouts: unemployment rate 2018 | Statista." May 9, 2019. Statista, Inc. <https://www.statista.com/statistics/184996/unemployment-rate-of-high-school-graduates-and-dropouts/> Accessed October 28, 2019.

I appreciate your commitment to English Language Learners (ELL) students and students with disabilities to make sure their unique needs are satisfied. **Please empower all children to graduate from high school using the most flexible pathway to graduation requirement** that they, their high school counselor and family believe is appropriate for the children and their abilities and family circumstances at that time. Thank you for your consideration and service to our children.

Sincerely,

Susan Baird-Joshi
Kirkland, WA 98034
sdbj.pta@gmail.com



October 28, 2019

Dear Chair Maier and Members of the State Board of Education,

League of Education Voters has a long history of working with the State Board of Education to ensure and support a meaningful high school diploma that prepares every student for their postsecondary goals. The Board has been a vital partner in efforts to ensure equitable access to rigorous college and career preparation, so that every student graduates from high school ready for their next step—regardless of where they live in the state. We appreciate the work of the Board over the years to maintain high standards and put the focus on how our system can better support students to reach those standards, rather than lowering the bar with adverse impacts on student preparation. We are very concerned that the draft rules on graduation pathways being proposed in response to HB 1599 represent a shift in the Board’s commitment to supporting and preparing students, and will not provide every student in Washington with rigorous opportunities to achieve their goals.

As written, the military and Career and Technical Education (CTE) pathways do not afford students access to authentic postsecondary preparation at a level comparable to the other pathways. Making these pathways less rigorous undermines our students’ opportunities for success and the exceptional work that has been happening in Washington districts to elevate career pathways and pathways other than a four-year baccalaureate degree as meaningful, family-wage options for students.

On the military pathway, the current rule language requires that a student meet the lowest score on the ASVAB set by a military branch for entrance, currently the Army, regardless of the branch that a student has identified as their goal. This means students will be able to graduate from high school without the proper preparation to meet their postsecondary goals identified in their High School and Beyond Plan—exactly the opposite of what HB 1599 intended and what the Board has indicated it hopes to avoid.

On the CTE pathway, the current rule language requires that students take two CTE courses to complete a sequence. This is just one additional course to what is already required for students to take as part of their 24-credits. The two courses do not need to be related, and only one course must meet the standard for being a preparatory course that prepares a student to earn a certificate or enroll in a technical program, rather than an exploratory class. The 24 credit diploma offers a multitude of opportunities for career exploration through electives, personalized pathway requirements, and course equivalencies. The graduation pathways established in these rules should be the opportunity for students to deeply pursue career preparation, and should be designed to guide a student on a rigorous career pathway. This means both courses should meet the standards for a preparatory course and should be related to one another.

The rules also do not guarantee that all students will have access to every pathway. The draft language allows students receiving special education services to be exempted from graduation requirements by their Individualized Education Plan (IEP) team. This means that students receiving special education services' access to graduation pathways and meaningful preparation for their goals will vary from school to school, district to district.

By creating pathways that are of varying levels of rigor, and allowing exemptions from requirements, the Board will create the conditions for tracking students who are not currently well served by our system—creating inequitable access to postsecondary preparation and opportunity for students of color, students in poverty, students learning English, and students receiving special education services.

Please change the rule language in the following ways:

1. Require that students accessing the military pathway must earn a score aligned with the branch of the military the student has identified as their goal branch.
2. Require that both courses in a CTE pathway meet the standard for a preparatory class, specified in RCW 28A.700.030, not just one.
3. Require that the CTE courses a student chooses on their pathway must be related.
4. Remove the clause “or exempted” from WAC 180-51-115 so that students on IEPs receive accommodations, supports, and comparable substitute requirements, but are not denied access to a graduation requirement.

Thank you for all of your work on behalf of Washington's students.

Sincerely,



Julia Warth
Director of Policy and Research
League of Education Voters

Cc:

MJ Bolt, Vice-Chair

Jeff Estes, Executive Committee Member at Large

Bill Kallappa II, Executive Committee Member at Large

Harium Martin-Morris, Executive Committee Member at Large

Randy Spaulding, Executive Director

Parker Teed, Rules Coordinator



The SEAC Statement on Graduation Pathways Rulemaking

The Special Education Advisory Council (SEAC) would like to acknowledge the actions of the legislature for establishing multiple pathways to graduation and appreciate the State Board of Education's drafted rules supporting the new requirements. The SEAC would urge the State Board of Education make every pathway available to all students, including those with disabilities. Historically, the Certificate of Individual Achievement (CIA) was created as an alternative for a very small percentage of students, less than 1 percent of students. However, over time, Individualized Education Plan (IEP) teams have over-utilized the CIA methodology to lower the state graduation standards for students with disabilities and created a system where in 2019, 49.3 percent of students with disabilities graduated with a CIA in reading and 62.1 percent of students with disabilities graduated with a CIA in math. Overall, resulting in a lower bar of expected academic achievement, with serious implications for post-secondary outcomes of students with disabilities.

In keeping with the SEAC's beliefs of growth mindset, authentic measurement of student learning, and individualized student programs, we would like to recommend that the State Board of Education:

- Clearly define the "limited circumstances" and "unique needs" that would allow for a substitution for one of the pathways referenced in WAC 180-51-115. We fear that this vague terminology will lead to overuse as we saw with the CIA. Less than 1 percent of students should qualify.
- Make definitions for each of the pathway requirements clear and focus on student strength.
- Remove the option for IEP teams to exempt students with disabilities from graduation requirements.
- Acknowledge that students with disabilities can and should be accessing and progressing in the K-12 Learning standards, with supplemental special education services and accommodations, as determined by the IEP team.

References

SEAC Recommendation for De-Linking the State Assessment and Graduation Requirements

https://www.k12.wa.us/sites/default/files/public/specialed/seac/pubdocs/Nov2018SEAC_RecommendationDeLinkStatewideAssessmentRequirement.pdf

Graduation Results for Students with Disabilities in Washington State prepared by Glenna Gallo, Assistant Superintendent, Special Education, September 17, 2019

Student Information, CAA/CIA Database, Office of Superintendent of Public Instruction, September 9, 2019

Multiple Pathways to Graduation — <https://www.k12.wa.us/student-success/graduation/graduation-requirements/multiple-pathways-graduation-house-bill-1599>

State of
Washington
House of
Representatives



October 28, 2019

Dear WA State Board of Education Members,

Thank you for the discussion, critical questioning, evaluating the current matters regarding high school graduation requirements, and considering future steps. I know there have been a variety of perspectives that have come your way in the rulemaking process for implementing HB 1599. As the sponsor of the bill, I had two guiding principles in development and sponsorship bill.

1. **Flexibility:** Districts around the state, especially our smaller districts, identify a lack of flexibility in which classes students must pass, or have opportunities to pass, in their High School and Beyond Plan. Creating the pathways in HB 1599 not only removes the barrier to graduation by requiring passage for students who can demonstrate proficiency in other ways, but also better articulates specific guidelines for the various pathways. I share the concern that where there may be sequenced courses in a program, they shall not be undermined. However, I also maintain faith in our local school boards to expect students to complete their required programs that yield gainfully employed adults after they leave our system. The proposed rules allow for success of programs with articulated sequenced classes without becoming restrictive for districts already struggling with flexibility.

As an example, small districts represented on a rural schools tour I was on in Eastern Washington reported that it takes them more time, staff, and funding to comply with the 24 credit framework than they get from the state. Requiring these under resourced districts to interpret what might be considered a sequence, rather than related content, would be an added challenge for schools already struggling with no promise

2. **Permeability:** We must continue to be diligent stewards of a public school system that provides opportunities for every student. When students become disengaged in their learning, they subsequently drop in attendance, fall behind in achievement, and become more likely to leave the system for more engaging and age-relevant activities before acquiring a diploma. Tracking students in programs without allowing the permeability that supports exploration is an unintended outcome that I am committed to avoiding.

For example, a student in a marketing program might choose to shift to a CTE program with a more focused skill, like cosmetology or design. A school district should be able to determine whether or not a course in that student's marketing program has transferrable

State of
Washington
House of
Representatives



content that allows the student to shift their focus to an area of passion without penalty. If proficiency and standards are the curriculum, in a K-12 setting that honors exploration of careers, students need permeability between programs.

In my conversations with large and small districts around the state, the theme that is the strongest in their feedback and the gratitude is simple: thank you for the flexibility in HB 1599. The pathways provide direction for districts and flexibility for students, and together those are an improvement in the state graduation requirements. As you move forward, I support the proposed rules because they align with the principles outlined above.

With respect and gratitude,

A handwritten signature in black ink that reads "Monica Stonier".

Rep. Monica Stonier, LD 49