



The Washington State Board of Education

An education system where students are engaged in personalized education pathways that prepare them for civic engagement, careers, postsecondary education, and lifelong learning.

November 5, 2019

Ad-Hoc Committee Recommended Amendments

Amendment I – Middle School Credit

Strike all text beginning on page 3, line 6 through page 4, line 10 and insert the following...

Effect: Adds reference to the RCW to define circumstances in which the high school credit would be earned. Changes the timing of the request such that the student and family decide if they would like to remove the credit or change to a non-numerical grade by the end of the 10th grade.

Amendment II – IEP Exemption from required coursework

On page 46 line 21 strike “or exempted”

Effect: Adoption of the amendment would mean that student could not be exempted from graduation credit and subject area requirements based on the IEP. This aligns with federal guidance and would support the argument that Washington offers a single diploma.

Amendment III - Rulemaking

On page 48 at the beginning of line 13 insert...

Effect: Establishes a commitment to the analysis of the pathways and encourages the Board to review their rules as part of that process.

Amendment IV – International Baccalaureate

Strike all text beginning on page 69, line 13 through page 70, line 2 and insert the following...

Effect: The change would clarify that IB English language and literature courses would meet the ELA pathway requirement.

Amendment V – ASVAB

Strike all text beginning on page 71, line 1 through page 72, line 14 and insert the following...

Effect: The amendment would clarify language on requirements for student notification and options related to sharing information with the military for recruiting purposes.

Amendment VI – CTE Pathway

Strike all text beginning on page 72, line 15 through page 74, line 17 and insert the following...

Effect: The amendment would address concerns raised by clarifying certain aspects of the draft rule, including the treatment of core plus curriculum and making changes to the policy to ensure the sequence of courses is technically intensive and rigorous. Specifically the amendment does three things:

- 1) The language is reorganized to more clearly communicate the requirements of this rule. By putting core plus first it makes it clearer that core plus is different than a CTE sequence and the two cannot be mixed and still meet core plus requirements.
- 2) Policy difference 1 – a sequence that crosses program areas would require approval by the Local CTE Advisory committee. Approved sequences would be reported annually to OSPI.
- 3) Policy difference 2- all courses in sequence would need to meet the 28A.700.030 definition.

Amendment I – Middle School Credit

Strike all text beginning on page 3, line 6 through page 4, line 10 and insert the following:

WAC 180-51-030 High school credit for courses taken before attending high school. ~~((See RCW 28A.230.090(4)-))~~ (1) A student who has completed high school courses as defined in RCW 28A.230.090 (4) with a passing grade before attending high school shall automatically be given high school credit which shall be applied to fulfilling high school graduation requirements, unless requested otherwise by the student and the student's parent or guardian.

(2) At the request of the student and the student's parent or guardian, high school credit earned before high school may be transcribed with a nonnumerical grade, such as "pass" or "credit." A nonnumerical grade will not be included in the student's high school grade point average calculation. High school credit earned prior to high school and transcribed with a nonnumerical grade will apply to fulfilling high school graduation requirements.

(3) A student and the student's parent or guardian must inform the school before the end of the 10th grade if they do not want credit for the course(s) taken before attending high school, or if they want to request that credit be transcribed with a nonnumerical grade.

Rationale:

Concerns have been raised that too much flexibility is offered in the proposed rule and that the deadline to decide whether or not a student wants the credit should occur earlier in high school, for example, before a student would be sending transcripts to colleges or scholarship providers. Other than generic statements of support for the rules as proposed, there has not been comment contrary to this concept.

Effect:

Adds reference to the RCW to define circumstances in which the high school credit would be earned. Changes the timing of the request such that the student and family decide if they would like to remove the credit or change to a non-numerical grade by the end of the 10th grade.

Markup of Proposed – Middle School

WAC 180-51-030 High school credit for courses taken before attending high school. ~~((See RCW 28A.230.090(4)-))~~ (1) A student who has completed high school courses **as defined in RCW 28A.230.090 (4)** with a passing grade before attending high school shall automatically be given high school credit which shall be applied to fulfilling high school graduation requirements, unless requested otherwise by the student and the student's parent or guardian.

(2) At the request of the student and the student's parent or guardian, high school credit earned before high school may be transcribed with a nonnumerical grade, such as "pass" or "credit." A nonnumerical grade will not be included in the student's high school grade point average calculation. High school credit earned prior to high school and transcribed with a nonnumerical grade will apply to fulfilling high school graduation requirements.

(3) A student and the student's ~~parent or guardian~~ family must inform the school before the end of the 10th grade ~~student graduates~~ if they do not want credit for the course(s) taken before attending high school, or if they want to request that credit be transcribed with a nonnumerical grade.

Amendment II – IEP Exemption from required coursework

On page 46 line 21 strike “or exempted”

Context:

A student with an individualized education program must be provided needed accommodations to progress in the general curriculum toward meeting state and local graduation requirements. In limited circumstances, when determined necessary by the individualized education program team due to the unique needs resulting from the student's disability, a graduation credit and subject area requirement may be substituted with comparable content course work **or exempted**, as identified in the individualized education program team course of study and aligned to the student's high school and beyond plan.

Rationale:

A concern raised is that exempting coursework or subject area requirements 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 change in language was not intended to reflect a change in policy, rather the intent was to clarify and update language and references in the section. However, the change highlighted a potential problem in our existing and proposed rule. OSPI recommends removing language that would allow for exemption of credit and subject area requirements. Other than generic statements of support for the rules as proposed, there has not been comment contrary to this concept.

Effect:

Adoption of the amendment would mean that student could not be exempted from graduation credit and subject area requirements based on the IEP. This aligns with federal guidance and would support the argument that Washington offers a single diploma.

Amendment III - Rulemaking

On page 48 at the beginning of line 13 insert:

(4) By December 2022 the Board will make recommendations to the legislature for policy changes that would require new legislation to address including barriers school districts have to offering all of the graduation pathways, equitable student access to all of the graduation pathways, modifications or additions to the pathways, or other challenges to implementing graduation pathways. Based on the analysis of the pathways and/or other feedback received during implementation of graduation pathways the Board may initiate rulemaking to address changes allowed within current statute.

Rationale:

SBE is required to analyze the equity and adequacy of the pathways. This addition to the rule will clarify that in addition to recommendations to the legislature the Board may also review rules to address any changes that are within the Board's current authority and would not require legislative action. Other than generic statements of support for the rules as proposed, there has not been comment contrary to this concept.

Effect:

Establishes a commitment to the analysis of the pathways and encourages the Board to review their rules as part of that process.

Amendment IV – International Baccalaureate

Strike all text beginning on page 69, line 13 through page 70, line 2 and insert the following:

(A) For English language arts, successfully complete one high school credit in any of the following courses with a grade of C+ or higher in each term: Advanced placement English language and composition, advanced placement English literature and composition, macroeconomics, microeconomics, psychology, United States history, world history, United States government and politics, or comparative government and politics; any of the international baccalaureate individuals and societies courses or English language and literature courses; or earn an E any of the following Cambridge advanced or Cambridge advanced subsidiary courses: English language, literature and English, English general paper, psychology, history, sociology, global perspectives and research, or law.

Rationale:

The pathways defined in E2SHB1599 include passage of certain courses with at least a C+ grade or a defined score on a standardized assessment. For International Baccalaureate (IB) the language indicates passage of a course in “English language arts” (ELA) or a score of 4 or higher on IB exams. The language in the bill further defines courses that meet the ELA requirement for IB as “any of the international baccalaureate individuals and societies courses.” Like the bill language the proposed rule states that any of the international baccalaureate individuals and societies course would meet this pathway.

The Board received feedback that the language is confusing because IB English is not an “individuals and societies” course. Those providing feedback are seeking clarification in rule that IB English would meet this requirement. Other than generic statements of support for the rules as proposed, there has not been comment contrary to this concept.

Effect:

The change would clarify that IB English language and literature courses would meet the ELA pathway requirement.

Markup of Proposed – IB

(A) For English language arts, successfully complete one high school credit in any of the following courses with a grade of C+ or higher in each term: Advanced placement English language and composition, advanced placement English literature and composition, macroeconomics, microeconomics, psychology, United States history, world history, United States government and politics, or comparative government and politics; any of the international baccalaureate individuals and societies courses or English language and literature courses; or earn an E any of the following Cambridge advanced or Cambridge advanced subsidiary courses: English language, literature and English, English general paper, psychology, history, sociology, global perspectives and research, or law.

Amendment V – ASVAB

Strike all text beginning on page 71, line 1 through page 72, line 14 and insert the following:

(g) Armed services vocational aptitude battery.

(i) Meet standard on the armed forces qualification test (AFQT) portion of the armed services vocational aptitude battery test (ASVAB) by scoring at least the minimum established by the military for eligibility to serve in a branch of the armed services at the time that the student takes the assessment. SBE will post eligibility scores at least annually by September 1st. Each student may choose to meet either the posted minimum score the year a student takes the armed services vocational aptitude battery or the score posted by the SBE on a later date prior to the student turning twenty-one years of age.

(ii) The school must inform the students taking the armed services vocational aptitude battery about the minimum eligibility score required by each branch of the military as well as information about eligibility requirements for specific military occupations. Schools are 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. The state board of education will maintain a web page with information about military occupation requirements and minimum eligibility scores required by each branch of the military.

(iii) Schools that offer the armed services vocational aptitude battery test must inform students regarding the ways in which their scores and personal information might be shared, per the agreement between the school and the United States Department of Defense which administers the armed services vocational aptitude battery. Each student must be given prior written notice of the option to decide whether the school can release the student's ASVAB scores to military recruiters for contact. A school administrator, teacher, or counselor must also explain and offer this option to the students on the day of the test.

(iv) This pathway does not require students to meet the physical or other requirements for military enlistment, require enlistment, or require students release their scores to the military for purposes of recruitment.

(v) 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.

Rationale:

The Board has heard comments in support of the ASVAB pathway that the lowest score among the branches should be used and many generic comments in support of the rules as proposed without specific reference to this issue. One contention for keeping the ASVAB as the lowest score are that it prevents a last-minute capacity challenge for students, parents, and counselors to modify High School and Beyond Plans to reflect "Armed Forces" or the lowest branch so that the student can graduate. The other contention has been that students will be directed to provide limited information on the specifics of their pathway and, instead, simply choose Armed Forces so that they can access the lowest score. However, there have also been concerns that by

referencing the lowest score among the branches we are setting the bar too low and students may be unprepared for life after high school. Some comments further asserted that this would be inequitable and lead to tracking kids of color to a lower standard. The primary suggestion regarding this concern is to require the score for the particular branch of Armed Forces that the student identifies in their High School and Beyond Plans. The proposed rules include a requirement that students are informed about the different minimum required scores of each branch, and that each occupation within a branch has a minimum required score (the proposed rules state that SBE will host this information on a webpage). In addition, at the request of staff Washington's local military entrance processing stations in Spokane, Seattle, and Portland provided suggested language related to release of student information to the military.

Effect:

Would clarify language on requirements for student notification and options related to sharing information with the military for recruiting purposes.

Markup of Proposed – ASVAB

(g) **Armed services vocational aptitude battery.**

(i) Meet standard on the armed forces qualification test (AFQT) portion of the armed services vocational aptitude battery test (ASVAB) by scoring at least the minimum established by the military for eligibility to serve in a branch of the armed services at the time that the student takes the assessment. SBE will post eligibility scores at least annually by September 1st. Each student may choose to meet either the posted minimum score the year a student takes the armed services vocational aptitude battery or the score posted by the SBE on a later date prior to the student turning twenty-one years of age.

(ii) The school must inform the students taking the armed services vocational aptitude battery about the minimum eligibility score required by each branch of the military as well as information about eligibility requirements for specific military occupations. Schools are 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. The state board of education will maintain a web page with information about military occupation requirements and minimum eligibility scores required by each branch of the military.

(iii) Schools that offer the armed services vocational aptitude battery test must inform students regarding the ways in which their scores and personal information might be shared, per the agreement between the school and the United States Department of Defense which administers the armed services vocational aptitude battery. Each student ~~must who utilizes the armed services vocational aptitude battery to satisfy this graduation pathway option will~~ be ~~given prior~~ provided a written notice of the option/opportunity to decide/indicate whether the ~~school can release student~~ school can release student ~~authorizes his or her information to be shared with~~ the student's ASVAB scores to military recruiters for contact. A school administrator, teacher, or counselor must also explain and offer this option to the students on the day of the test.

(iv) This pathway does not require students to meet the physical or other requirements for military enlistment, require enlistment, or require students release their scores to the military for purposes of recruitment.

(~~v~~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) The state board of education will maintain a web page with information about this pathway, including information about military occupation requirements and minimum eligibility scores required by each branch of the military. SBE will post eligibility scores by September 1st annually and each student may choose to meet either that minimum score the year a student takes the armed services vocational aptitude battery or the score established by any branch of the military on a later date prior to the student turning twenty one years of age.~~

Amendment VI – CTE Pathway

Strike all text beginning on page 72, line 15 through page 74, line 17 and insert the following:

(h) **Career and technical education course sequence.** Complete the curriculum requirements of a core plus program relevant to the student's postsecondary goals outlined in the student's high school and beyond plan as defined in WAC 180-51-220 in aerospace, maritime, health care, information technology, or construction and manufacturing; or complete a sequence of at least two high school credits in career and technical education (CTE) courses that meet the following criteria:

(i) The sequence is comprised of courses that are technically intensive and rigorous in a progression relevant to the student's postsecondary goals outlined in the student's high school and beyond plan as defined in WAC 180-51-220. Courses to satisfy this pathway must be comprised of either:

(A) courses within the same career and technical program area, or

(B) a local sequence of courses within more than one career and technical program area if approved by a district's local vocational (Career and Technical Education) advisory committee established under RCW 28A.150.500. The district must annually report approved local sequences for the prior school year to the Office of the Superintendent of Public Instruction.

(ii) Each sequence of career and technical education courses must be comprised of courses that meet the minimum criteria identified in RCW 28A.700.030. Specifically, the courses must:

(A) either:

(I) 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

(II) allow students to earn dual credit for high school and college through tech prep (CTE Dual Credit), advanced placement, or other agreements or programs.

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

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

(iii) Satisfying the CTE pathway does not require a student to take a course that is part of a career and technical education preparatory program that is approved under RCW 28A.700.030 nor does satisfying this pathway require students to meet the separate English and mathematics graduation pathway requirements of pathway options (a) through (f) of this subsection.

(iv) 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.

Rationale:

The CTE pathway recognizes students who “complete a sequence of career and technical education courses that are relevant to a student’s postsecondary pathway.” The Board has interpreted this in rule to mean that the sequence must be aligned with the student’s goals as defined in the High School and Beyond Plan. The courses included must meet either the requirements of the Core Plus curriculum or

consist of a sequence of at least two CTE courses that are courses, at least one of which must either lead to an industry recognized certificate or be a dual credit course. In addition, the bill and the proposed rule state that CTE courses must “be comprised of a sequenced progression of multiple courses that are technically intensive and rigorous” and “Lead to workforce entry, state or nationally approved apprenticeships, or postsecondary education in a related field.” These requirements are outlined in the bill by reference to RCW 29A.700.030. For a CTE sequence the rule further states the sequence may consist of courses from a single program area or from multiple program areas as long as they are determined to be relevant by the student's High School and Beyond Plan in consultation with school personnel.

The Board has received a great deal of feedback on this section of rule that highlight confusion on some aspects of the language in the proposed rule and some differences in interpretation and suggestions for revisions to the policy. The comments voicing supporting for the CTE sequence as proposed has been considerably more limited than the comments voicing concern over the CTE sequence as proposed. Public comment has included a suggestion that local CTE advisory councils be allowed to create CTE course sequences.

Effect:

The amendment would address concerns raised by clarifying certain aspects of the draft rule, including the treatment of core plus curriculum and making changes to the policy to ensure the sequence of courses is technically intensive and rigorous. Specifically the amendment does three things:

- 1) The language is reorganized to more clearly communicate the requirements of this rule. By putting core plus first it makes it clearer that core plus is different than a CTE sequence and the two cannot be mixed and still meet core plus requirements.
- 2) Policy difference 1 – a sequence that crosses program areas would require approval by the Local CTE Advisory committee. Approved sequences would be reported annually to OSPI.
- 3) Policy difference 2- all courses in sequence would need to meet the 28A.700.030 definition.

Mark-up of Proposed – CTE Pathway

(h) **Career and technical education course sequence.** Complete the curriculum requirements of a core plus program relevant to the student's postsecondary goals outlined in the student's high school and beyond plan as defined in WAC 180-51-220 in aerospace, maritime, health care, information technology, or construction and manufacturing; or complete a sequence of at least two high school credits in career and technical education (CTE) courses that meet the following criteria: Complete a sequence of career and technical education courses.

(i) The For this subsection, "sequence" is comprised defined as: Two or more high school credits of career and technical education courses that are technically intensive and rigorous in a progression tailored to the student's goals and relevant to the student's postsecondary goals pathway(s) outlined in the student's high school and beyond plan as defined in WAC 180-51-220. A student's sequence of career and technical education courses to satisfy this pathway must may be comprised of either:

(A) courses within the same career and technical education program area, or

~~(B) a local sequence of~~ courses within more than one career and technical ~~education~~ program area ~~if approved, as determined relevant by a district's local vocational (Career and Technical Education) advisory committee established under RCW 28A.150.500. The district must annually report approved local sequences for the prior school year to the Office of the Superintendent of Public Instruction. student's high school and beyond plan in consultation with school personnel. A student's career and technical education course sequence may include courses leading to workforce entry, state or nationally approved apprenticeships, or postsecondary education.~~

~~(ii)(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 be comprised of courses include at least one course that meet~~meets the requirements in ~~(h)(i)(A) or (B) of this subsection:~~

~~(A) The minimum criteria identified in RCW 28A.700.030. Specifically, the courses must:~~

~~(A) either:~~

~~(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 (CTE Dual Credit), 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.~~

~~(iii) Satisfying the CTE pathway does not require a student to take a course that is part of a career and technical education preparatory program that is approved under RCW 28A.700.030 nor does satisfying this pathway(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.

~~(iv)~~ 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.