



June 16, 2014

Dear Washington State Board of Education members and staff,

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

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

1) Parent engagement

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

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

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

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

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

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

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

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

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

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

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

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

2) Rigor

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

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

As a 2013 study jointly written by the Washington Student Achievement Council, the State Board for Community and Technical Colleges, and the Workforce Training and Education Coordinating Board highlighted¹:

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

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

Given these realities, we strongly suggest the following:

a. Restrict credits that may be waived to electives.

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

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

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

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

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

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

b. Provide more specificity and limitations around "unusual circumstances."

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

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

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

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

c. Require transparency from school districts regarding student credits.

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

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

Sincerely,

Excellent Schools Now Coalition

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

ⁱ A Skilled and Educated Workforce, WSAC, SBCTC, WTECB, October 2013

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

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

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