

State of  
Washington  
House of  
Representatives



June 30, 2014

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

Dear State Board Members;

We request that the proposed rules to implement SB 6552 be revised to reflect the intent of the Legislature. Below we enumerate the three major areas where the proposed rules are out of alignment with the letter, spirit or intent of the law. This letter addresses only those concerns that result from the proposed rules to implement the new 24 credit framework for high school graduation.

At your recent public forum on June 6<sup>th</sup>, Reps. Hunt and Reykdal provided public comment based on feedback from the group of legislators who crafted the final version of SB 6552 which passed the Legislature (House 93-5 and Senate 45-2) on March 13, 2014 and was signed into law by Governor Inslee on April 3, 2014. This letter reinforces those comments.

Below are three areas where proposed WAC 180-51-068 is inconsistent with legislative intent:

- Our intent as a Legislature was to allow the two credit waiver for unusual circumstances to apply to the entire 24 credit portfolio - not just the seven flexible credits beyond the core 17 credits. The goal of this policy was to allow the maximum flexibility to districts in order to meet the unique needs of their students. The proposed rule does NOT allow for this flexibility. The clear intent of the Legislature was to have the Washington State School Directors Association (WSSDA) develop a model policy for districts BEFORE the SBE adopted rules. Otherwise, there would have been no point in our directing WSSDA to develop a model policy. The rules should wait and take into consideration the model policy developed by WSSDA.
- The role of the parent or guardian in the decision making process regarding the 3rd credit of math and science is the foremost role. School principal and counselor would be secondary. The rules are not clear on the primacy of the parent/guardian decision.
- The SBE has exceeded the intent and scope of the bill by requiring the HSBP to begin in the 8th grade. While we agree that the most promising practices indicate that HSBPs begin in the 7<sup>th</sup> or 8<sup>th</sup> grade, we simply did not get to this issue with any depth in the legislation and therefore enacting a rule to require it in the 7<sup>th</sup> or 8<sup>th</sup> grade violates the law at this time.

State of  
Washington  
House of  
Representatives



We strongly urge you to make the appropriate revisions to the proposed rules to reflect the actual intent of the Legislature.

Sincerely:

Sherry Appleton  
State Representative  
23<sup>rd</sup> Legislative District

Susan Fagan  
State Representative  
9<sup>th</sup> Legislative District

Kathy Haigh  
State Representative  
35<sup>th</sup> Legislative District

Brian Blake  
State Representative  
19<sup>th</sup> Legislative District

Jake Fey  
State Representative  
27<sup>th</sup> Legislative District

Larry Haler  
State Representative  
8<sup>th</sup> Legislative District

Vincent Buys  
State Representative  
42<sup>nd</sup> Legislative District

Tami Green  
State Representative  
28<sup>th</sup> Legislative District

Paul Harris  
State Representative  
17<sup>th</sup> Legislative District

Eileen Cody  
State Representative  
34<sup>th</sup> Legislative District

Mia Gregerson  
State Representative  
33<sup>rd</sup> Legislative District

Dave Hayes  
State Representative  
10<sup>th</sup> Legislative District

State of  
Washington  
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Representatives



Jeff Holy  
State Representative  
6<sup>th</sup> Legislative District

Joel Kretz  
State Representative  
7<sup>th</sup> Legislative District

Kevin Parker  
State Representative  
6<sup>th</sup> Legislative District

Graham Hunt  
State Representative  
2<sup>nd</sup> Legislative District

Jim Moeller  
State Representative  
49<sup>th</sup> Legislative District

Chris Reykdal  
State Representative  
22<sup>nd</sup> Legislative District

Sam Hunt  
State Representative  
22<sup>nd</sup> Legislative District

Luis Moscoso  
State Representative  
1<sup>st</sup> Legislative District

Sharon Tomiko Santos  
State Representative  
37<sup>th</sup> Legislative District

Norm Johnson  
State Representative  
14<sup>th</sup> Legislative District

Lillian Ortiz-Self  
State Representative  
21<sup>st</sup> Legislative District

Larry Seaquist  
State Representative  
26<sup>th</sup> Legislative District

Linda Kochmar  
State Representative  
30<sup>th</sup> Legislative District

Jason Overstreet  
State Representative  
42<sup>nd</sup> Legislative District

Elizabeth Scott  
State Representative  
39<sup>th</sup> Legislative District

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Washington  
House of  
Representatives



Handwritten signature of Mike Sells in black ink.

Mike Sells  
State Representative  
38<sup>th</sup> Legislative District

Handwritten signature of David Taylor in black ink.

David Taylor  
State Representative  
15<sup>th</sup> Legislative District

Handwritten signature of Matt Shea in black ink.

Matt Shea  
State Representative  
4<sup>th</sup> Legislative District

Handwritten signature of Steve Tharinger in black ink.

Steve Tharinger  
State Representative  
24<sup>th</sup> Legislative District

Handwritten signature of Shelly Short in black ink.

Shelly Short  
State Representative  
7<sup>th</sup> Legislative District

Handwritten signature of Hans Zeiger in black ink.

Hans Zeiger  
State Representative  
25<sup>th</sup> Legislative District

Handwritten signature of Monica Stonier in black ink.

Monica Stonier  
State Representative  
17<sup>th</sup> Legislative District

cc: Ben Rarick, SBE Executive Director  
Speaker Frank Chopp  
Rep. Dan Christiansen  
Rep. Dan Sullivan  
Rep. Sharon Tomiko Santos

# The School Alliance

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

July 1, 2014

Washington State Board of Education  
Old Capitol Building, Room 253  
600 Washington Street S.E.  
P.O. Box 47206  
Olympia, WA 98504

Dear Board Members:

Thank you for the opportunity to provide comment on the Proposed Rules to implement E2SSB 6552. The School Alliance is concerned that several sections of the Proposed Rules would reduce the authority of local school boards. We request that the Board revise these provisions.

In summary, E2SSB 6552 authorizes school boards to adopt a policy so that students can request waivers for up to two credits of the Career & College Ready Graduation Requirements. The Rule limits the usefulness of the waiver and restricts local decision-making. Second, the Proposed Rule regarding a high school student's choice for a third credit of math and third credit of science could place an unnecessary administrative burden and impose an unfunded mandate on school districts. Third, the approval process detailed in the Proposed Rule could unnecessarily duplicate districts' current course selection procedures in their High School and Beyond Plan. Fourth, the Proposed Rule changes the High School and Beyond Plan and includes mandates for middle school students. This goes beyond the scope of the E2SSB 6552, with its focus on high school graduation requirements and instructional hours.

## **I. "Core State Requirements" and the Two-Credit Individual Waiver:**

During the 2014 Legislative Session, a number of bills were introduced to adopt the course credit framework set forth in the State Board of Education's ("SBE") January 2014 Resolution. Along with the required 24-credit course allocation, the January 2014 Resolution allowed for up to two credits to be waived, but with substantial restrictions. The SBE's waiver was available: only if a student attempted and failed the courses first; only to waive up to two of the seven elective or Personal Pathway Requirement courses; and only if the student needed to "fulfill the 17 core state requirements."

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

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

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

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

In the Proposed Rules (attached as they appear in the Washington State Register, Issue 14-12, Proposed Rules), the Rule recognizes the authority of school boards to define "unusual circumstances." The Rule states that districts "may waive up to two of the credits required for graduation... for individual students for reason of unusual circumstances, as defined by the district." Proposed WAC 180-51-068(12), page 128.

Unfortunately, even though the Legislature did not adopt this language, the Rule incorporates a part of the restriction from SBE's January 2014 Resolution. The draft Rule requires that students receiving a one- or two-credit waiver must still earn the 17 required subject credits (English, Math, Science, Social Studies, Health and Fitness, Arts, and Career and Technical Education).

We believe that this limitation in the Proposed Rules does not reflect the intent of the Legislature, which adopted a broad waiver instead of the SBE's January 2014 waiver. Within its directive to enact a waiver to be defined by school boards, the Legislature appears to have rejected the SBE's two-credit waiver and created a different waiver that can be applied to any of the 24 credits under limited situations. This view is supported by the comments provided by legislators at the June 6, 2014 webinar sponsored by the SBE. Key legislators stated that it was their intent to make the two-credit waiver applicable to all 24 credits.

Reading the bill in its entirety provides an additional perspective. In subsection 202(1)(d)(i), the Legislature adopted the SBE's Career & College Ready Requirements, mandating a 24-credit diploma for the Class of 2019 and beyond. With this change, the 24-credit diploma will include three science credits to go along with the existing three-credit math program. The same section

of E2SSB 6552 also includes the two-credit waiver for “unusual circumstances.” The existence of both increased rigor and increased flexibility within a single subsection of the bill demonstrates the Legislature’s commitment to balancing policy directives: math and science rigor and local flexibility.

On the other hand, SBE’s designation of 17 credits as “required subject credits” is not supported by E2SSB 6552, nor by any other provisions of the statute or the Washington Administrative Code. The notion that the 17 credits are more important than the other seven credits first appeared in SBE’s January 2014 Resolution.

We suggest that the SBE consider taking a balanced approach. First, the amendment proposed below would recognize that the waiver is available for all 24 credits. Second, the amendment would acknowledge that the Legislature has recently increased the science and math requirements for graduation. Therefore, even under “unusual circumstances,” a student can only request a waiver for a maximum of one science credit and a waiver for a maximum of one math credit.

Accordingly, we suggest that the text of Proposed WAC 180-51-068(12), page 128, be amended as shown below:

~~Students granted a waiver under this subsection must earn the~~  
~~seventeen required subject credits in subsections (1) through (7)~~  
at least two of the three mathematics credits in subsection (2),  
and at least two of the three science credits in subsection (3),  
including by satisfactory demonstration of competence under WAC  
180-51-050.

This amendment ensures that even those students who can demonstrate that they face “unusual circumstances” and are eligible for a waiver under school board adopted policies must still earn two science credits and two math credits -- at a minimum -- in order to graduate. Such a revision preserves the flexibility legislators intended school boards to have with the two-credit waiver, without raising the potential that it could undercut the science and math requirements of the Career & College Ready diploma.

## **II. Additional Administrative Burden:**

Second, the Proposed Rules impose additional administrative burdens on school districts. E2SSB 6552 requires approval under specific circumstances:

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

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

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

We share the perspective that the Legislature's placement of "parent or guardian" before "school counselor or principal" in E2SSB 6552 indicates that a student should first obtain the agreement of a parent or guardian. Currently, SBE's regulations allow a designee (such as a counselor or a principal) to step in and agree to a student's alternative third math choice "if a parent or guardian is unavailable." WAC 180-51-067(2)(b).

The Proposed Rule adds a new clause: "or, if the parent or guardian ... does not respond to a request from the school for approval..." Proposed WAC 180-51-068(2)(a)(iii) and 180-51-068(3), pages 126 and 127. It is unclear what the new requirement is and whether it imposes a new unfunded mandate on school districts. We request that this clause be deleted as shown below:

A third credit of high-school mathematics, aligning with the student's interests and high school and beyond plan as provided in (10) of this section, and preparing the student to meet state standards for graduation under the assessment system in RCW 28A.266.061, with agreement of the student's parent or guardian, ~~or if the parent or guardian is unavailable or does not respond to a request from the school for approval of a specific course,~~ agreement of the school counselor or principal;

Proposed WAC 180-51-068(2)(a)(iii), page 126. We also request that the State Board adopt the same amendment to the wording for the third science requirement in Proposed WAC 180-51-068(3), page 127.

### **III. Integration:**

Third, the SBE should play a leadership role in integrating components of E2SSB 6552 with the existing educational framework.

Under existing law, school districts make decisions on the High School and Beyond Plan ("HSBP"). RCW 28A.230.090(1)(c) ("Any decision on whether a student has met the state board's high school graduation requirements for a high school and beyond plan shall remain at the local level."). It is also clear that the Legislature intended the student to choose the third science and the third science course. E2SSB 6552 Sec. 202(1)(d)(i) ("The rules must also provide that the content of the third credit of mathematics and the content of the third credit of science may be chosen by the student based on the student's interests and high school and

beyond plan with agreement of the student's parent or guardian or agreement of the school counselor or principal.”).

There are some students who will make more general statements in their HSBP. There are others who will designate the content of the third science and third math courses as a part of their HSBP. To the extent that a student has already identified the third science and/or the third math in his or her HSBP, a duplicative approval process for those same third science and/or same third math class should not be required. For this reason, we request the following change in the Proposed Rules as shown:

A third credit of high-school mathematics, aligning with the student's interests and high school and beyond plan as provided in (10) of this section, and preparing the student to meet state standards for graduation under the assessment system in RCW 28A.266.061, with agreement of the student's parent or guardian, or if the parent or guardian is unavailable or does not respond to a request from the school for approval of a specific course, agreement of the school counselor or principal; provided that, such agreement is not needed if the third credit of mathematics is designated in the student's high school and beyond plan;

Proposed WAC 180-51-068(2)(a)(iii), page 126. We request a similar change for the third science requirement in Proposed WAC 180-51-068(3), page 127.

Taken together with the suggested amendment in Section II of this letter, without the strikethroughs and additions, the amended Proposed WAC would read:

A third credit of high-school mathematics, aligning with the student's interests and high school and beyond plan as provided in (10) of this section, and preparing the student to meet state standards for graduation under the assessment system in RCW 28A.266.061, with agreement of the student's parent or guardian, or if the parent or guardian is unavailable, agreement of the school counselor or principal; provided that, such agreement is not needed if the third credit of mathematics is designated in the student's high school and beyond plan;

Proposed WAC 180-51-068(2)(a)(iii), page 126, with a similar change to the language for the third science requirement in Proposed WAC 180-51-068(3), page 127.

#### **IV. Middle School Students:**

Fourth, elements of the Proposed Rules are beyond the scope of E2SSB 6552 and could undermine local authority by adding more to the HSBP. The Proposed Rule includes HSBP guidance that will expand upon the minimal direction in the current regulation. Proposed

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WAC 180-51-068(10), page 127. *See also* WAC 180-51-067(10) (“Each student shall have a high school and beyond plan for their high school experience, including what they expect to do the year following graduation.”). However, we believe that the new Rules go too far in the other direction, as they would make four new HSBP elements mandatory for students entering high school beginning in fall 2015. Currently, these students are rising-eighth graders.

The new HSBP regulations involves the same rising-eighth graders. The Rules as proposed would mandate that while still in middle school, these students create a HSBP with a “four-year plan for course-taking... that will ensure fulfillment of graduation requirements.” They must also identify their “educational and career goals, including identification of a personalized pathway and personalized pathway requirements.” Proposed WAC 180-51-068(10), page 127.

This part of the Proposed Rules goes beyond the scope of E2SSB 6552, which implements the 24-credit requirements for high school students, and does not impose requirements for middle school students.

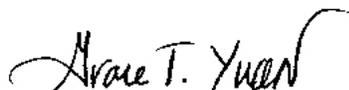
As noted above, districts already have their own, locally created processes for the HSBP. Aside from the State mandate that students must have a HSBP, all procedures associated the HSBP are under local control. The Legislature has reconfirmed this decision by not amending the provisions governing the HSBP in state law. *See* E2SSB 6552 Sec. 202(1)(c) (making no change to RCW 28A.230.090(1)(c): “Any decision on whether a student has met the state board’s high school graduation requirements for a high school and beyond plan shall remain at the local level.”). Therefore, we would request that the reference to middle school students be deleted from the Proposed Rules, as shown in the amendment below:

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

Proposed WAC 180-51-068(10)(c), page 127.

Again, thank you for the opportunity to comment. If you have any questions, please call me at (206) 370-7814.

Sincerely,



Grace T. Yuan  
Legal Counsel



To: Washington State Board of Education  
From: Jeff Vincent, CEO Laird Norton Company, LLC  
Date: July 2, 2014  
Re: Core State Requirements and the Two-Credit Individual Waiver

Dear Board Members:

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Thank you for this opportunity to express my opinions regarding the Washington State Board of Education's Proposed Rules to implement E2SSB 6552. It is imperative for the Board to maintain its autonomy in defining and standardizing the two credits that may be waived in order to meet graduation requirements.

In its current state, the Proposed Rules, Section 12 limits the two credits that a student may waive under "unusual circumstances" to the seven electives, leaving the 17 core requirements intact and necessary for achieving Washington state graduation requirements. This rule must remain as defined to prevent gutting the law's intent.

If the State Board of Education allows the Washington State School Director's Association and local school districts to determine and define which credits may or may not be waived, I fear that our state will continue to lag behind other states' graduation requirements, to provide sub-optimal levels of academic rigor, and to provide unequal access – particularly from among our low income students – to postsecondary options.

**Academic Rigor:**

For more than six years, Washington state legislators, organizations, schools, and parents have been fighting for our state to adopt high school graduation requirements that meet the academic rigors of the state's post-secondary institutions and employers. Through the passage of SB 6522 during the 2014 session, state legislators took a progressive step toward making high school diplomas "meaningful" and preparing students to be successful in today's global economy.

The law's intent calls for school districts to increase graduation requirements from 20 credits to 24. Seventeen of the credits are "core" credits, which were defined in order to provide every Washington student – regardless of the high school attended or zip code in which that high school is located – the same opportunity to attend four-year postsecondary institutions and to be prepared for other post-secondary education and training.

In the Board's original framework for the 24-Credit Career and College Ready Diploma Requirements, the vision of the Board was to "establish common, coherent, and rigorous graduation requirements that kept all options open for students after high school." Having served on the State Board of Education as the diploma was being conceptualized, I too believe in this vision for Washington's students and spent my tenure on the State Board of Education advocating for every Washington student to have these options. Given this clearly written section of the law and the years of discussion about the diploma's role in leveling the playing field for every Washington student, it is frankly astonishing to learn that anyone would conclude that we actually wanted to provide school districts with the opportunity to water down the core credit requirements and to even diminish the core credits *currently* required under the existing 20 credit high school diploma.

If districts allow students to “waive” any of the 17 core credits necessary for students to meet those requirements, I believe that we will fail to fulfill this vision. We must uphold the rules as written and establish, at the state level, that the scope of permissible ‘waivable’ credits extends only to the seven elective credits. Local school districts and WSSDA should be limited to defining extenuating circumstances as they relate to the seven elective credits and not to watering down the intent of the College and Career Ready Diploma.

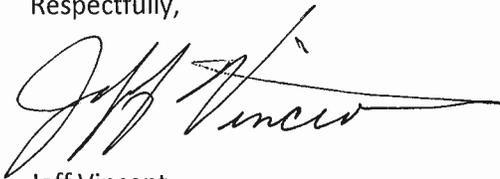
**Student Equity:**

Washington State is home to 295 diverse school districts. In 2008 data from the BERC Group revealed that the state of Washington faces some of the lowest college preparation rates in the nation. Students of color and students from low-socioeconomic backgrounds suffer the most when compared with White and Asian American students in college readiness. If the two-credit individual waiver is open to all 24 credits, students who already face academic disparities within the state and school districts will be subject to continuing educational and academic inequities.

While students in certain districts will be held to the rigorous academic standards set out by SB 5266, other districts may waive key math and science courses imperative to a **meaningful** high school diploma.

Thank you for your time, and consideration of my thoughts on the matter.

Respectfully,

A handwritten signature in black ink, appearing to read "Jeff Vincent", with a long horizontal flourish extending to the right.

Jeff Vincent



3900 Broadway, Everett, WA 98201  
www.everettsd.org

Board of Directors          June 24, 2014

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*Assistant Superintendent*

Washington State Board of Education  
Old Capitol Building, Room 253  
600 Washington Street S.E.  
P.O. Box 47206  
Olympia, WA 98504

Dear Board Members:

On behalf of Everett Public Schools, thank you for the opportunity to provide comment on the Proposed Rules to implement Chapter 217, Laws of 2014 (E2SSB 6552). We are concerned that several sections of the Proposed Rules would reduce our authority as elected school board members. We request that the state Board revise these provisions.

First, E2SSB 6552 authorizes us -- as a school board -- to adopt a policy so that students can request waivers for up to two credits of the Career & College Ready Graduation Requirements. The Proposed Rule limits the usefulness of the waiver and restricts local decision-making. Second, the Proposed Rule regarding a high school student's choice for a third credit of math and third credit of science could place an unnecessary administrative burden and impose an unfunded mandate on school districts. Third, the Proposed Rules would make changes to the High School and Beyond Plan that include mandates for middle schools. This appears to go beyond the scope of the E2SSB 6552, with its focus on high school graduation requirements and instructional hours.

#### **I. "Core State Requirements" and the Two-Credit Individual Waiver:**

During the 2014 Legislative Session, a number of bills were introduced to adopt the course credit framework set forth in the State Board of Education's January 2014 Resolution. Along with the required 24-credit course allocation, the January 2014 Resolution allowed for up to two credits to be waived, but with substantial restrictions. The SBE's waiver was available; only if a student attempted and failed the courses first; only to waive up to two of the seven elective or Personal Pathway Requirement courses; and only if the student needed to "fulfill the 17 core state requirements".

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

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

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

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

In the Proposed Rules (as they appear in the Washington State Register, Issue 14-12, Proposed Rules), the Rule recognizes the authority of school boards to define “unusual circumstances.” The Rule states that districts “may waive up to two of the credits required for graduation ... for individual students for reason of unusual circumstances, as defined by the district.” Proposed WAC 180-51-068(12), Page 128.

Unfortunately, even though the Legislature did *not* adopt this language, the Proposed Rule incorporates a part of the restriction from the January 2014 Resolution. The Proposed Rule requires that students receiving a one- or two-credit waiver must still earn the 17 required subject credits (English, Math, Science, Social Studies, Health and Fitness, Arts and Career and Technical Education).

We believe that this limitation in the Proposed Rule does not reflect the intent of the Legislature, which adopted a broad waiver instead of the SBE’s January 2014 waiver. Within its directive to enact a waiver to be defined by school boards, the Legislature appears to have rejected the SBE’s two-credit waiver and created a different waiver that can be applied to any of the 24 credits under limited situations. This view is supported by the comments provided by legislators at the June 6, 2014 webinar sponsored by the State Board. Key legislators stated that it was their intent to make the two-credit waiver applicable to all 24 credits.

Reading the bill in its entirety provides an additional perspective. In subsection 202(1)(d)(i), the Legislature adopted the SBE’s Career & College Ready Requirements, mandating a 24-credit diploma for the Class of 2019 and beyond. With this change, the 24-credit diploma will include three science credits to go along with the existing three-credit math program. The same section of E2SSB 6552 also includes the two-credit waiver for “unusual circumstances.” The existence of both increased rigor and increased flexibility within a single subsection of the bill demonstrates the Legislature’s commitment to balancing policy directives: math and science rigor and local flexibility.

On the other hand, SBE’s designation of 17 credits as “required subject credits” is not supported by E2SSB 6552, nor by any other provisions of the statute or the Washington Administrative Code. The notion that the 17 credits are more important than the other seven credits first appeared in SBE’s January 2014 Resolution. Therefore, we request that the two waivers be available to all 24 credits and that school boards retain our authority to adopt the policies outlining “unusual circumstances.”

## **II. High School and Beyond Plans:**

Second, the Proposed Rules impose additional administrative burdens on our school district. E2SSB 6552 requires approval under specific circumstances:

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

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

We share the perspective that the Legislature's placement of "parent or guardian" before "school counselor or principal" in E2SSB 6552 indicates that a student should first obtain the agreement of a parent or guardian. Currently, the State Board's regulations allow a designee (such as a counselor or a principal) to step in and agree to a student's alternative third math choice "if a parent or guardian is unavailable." WAC 180-51-067(2)(b).

The Proposed Rule adds a new clause, "or, if the parent or guardian... does not respond to a request from the school for approval...." Proposed WAC 180-51-068(2)(a)(iii) and 180-51-068(3), Pages 126 and 127. It is unclear what the new requirement is and whether it imposes a new unfunded mandate on school districts. We request that this clause be deleted as shown in the suggested amendment below, from:

A third credit of high-school mathematics, aligning with the student's interests and high school and beyond plan as provided in (10) of this section, and preparing the student to meet state standards for graduation under the assessment system in RCW 28A.266.061, with agreement of the student's parent or guardian, or, if the parent or guardian is unavailable or does not respond to a request from the school for approval of a specific course, agreement of the school counselor or principal;

To:

A third credit of high-school mathematics, aligning with the student's interests and high school and beyond plan as provided in (10) of this section, and preparing the student to meet state standards for graduation under the assessment system in RCW 28A.266.061, with agreement of the student's parent or guardian, ~~or if the parent or guardian is unavailable, or does not respond to a request from the school for approval of a specific course,~~ agreement of the school counselor or principal;

Proposed WAC 180-51-068(2)(a)(iii), Page 126. We also request that the State Board adopt the same amendment to the wording for the third science requirement in Proposed WAC 180-51-068(3), Page 127.

### III. Middle School Students:

Third, elements of the Proposed Rules are beyond the scope of E2SSB 6552 and could undermine our board's authority by adding more requirements for the HSBP. The Proposed Rule includes well-meaning HSBP guidance that will

expand upon the minimal direction in the current regulation. Proposed WAC 180-51-068(10), Page 127. *See also* WAC 180-51-067(10) ("Each student shall have a high school and beyond plan for their high school experience, including what they expect to do the year following graduation."). However, we believe that the new Rules go too far in the other direction, as they would make four new HSBP elements mandatory for students entering high school beginning in Fall 2015. Currently, these students are rising-eighth graders.

The most burdensome of these new HSBP regulations involves the same rising-eighth graders. The Rules as proposed would mandate that while still in middle school, these students create a HSBP with a "four-year plan for course-taking ... that will ensure fulfillment of graduation requirements." They must also identify their "educational and career goals, including identification of a personalized pathway and personalized pathway requirements." Proposed WAC 180-51-068(10), Page 127.

This regulation goes beyond the scope of E2SSB 6552, which implements the 24-credit requirements for high school students, and never imposes the requirements for middle school students.

Districts already have our own, locally created processes for the HSBP, which students create in cooperation with their parents or guardians and school staff. Aside from the State mandate that students must have a HSBP, all procedures associated the HSBP are under local district control. The Legislature has reconfirmed this decision by not amending the provisions governing HSBP in the statute. *See* E2SSB 6552 Sec. 202(1)(c) ("Any decision on whether a student has met the state board's high school graduation requirements for a high school and beyond plan shall remain at the local level.").

Again, thank you for the opportunity to comment.

Sincerely,

Everett Public Schools Board of Directors



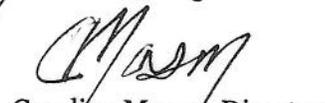
Pam LeSeshe, President



Carol Andrews, Vice President



Ted Wenta, Legislative Representative



Caroline Mason, Director



Traci Mitchell, Director

**From:** [barbara@checkmediainc.com](mailto:barbara@checkmediainc.com) [<mailto:barbara@checkmediainc.com>] **On Behalf Of** Barbara O'Kelly  
**Sent:** Tuesday, July 01, 2014 4:47 PM  
**To:** SBE  
**Subject:** Feedback-E2SSB 6552

Hi,

Thank-you for the opportunity to provide feedback on SB 6552. The enhanced graduation requirements are needed, all of our students need to be prepared for college and/or career after high school. I am concerned about students with disabilities:

- Will students with disabilities, ranging from students with learning disabilities to those with intellectual/developmental disabilities, be given supports to accomplish the new graduation standards?
- Will those with ID/DD have equal access to high expectations and high supports to accomplish the new standards?
- How will schools be held accountable for students with disabilities?
- Funding follows supports.
- I am grateful that there is a legislative task force addressing this issue, when will the public hear from them?

Thanks again,

Barbara O'Kelly  
Marysville Special Education PTSA  
[barbara@elcarro.net](mailto:barbara@elcarro.net)  
425-754-9945

**From:** Erika Brown Wagner [<mailto:elb@MIT.EDU>]  
**Sent:** Tuesday, July 01, 2014 1:13 PM  
**To:** SBE  
**Subject:** E2SSB 6552

As a Seattle Public School mother and STEM professional, I just wanted to take a moment to thank you for the ways in which E2SSB 6552 ensures that STEM education is a fundamental part of high school graduation requirements, while granting students flexibility in course choices.

I encourage you to protect the core 17 graduation requirements from the waiver process, including the three math and three science credits, and to preserve language regarding students' selection of the third credit of math which calls out the intent that students are prepared to succeed on state graduation tests.

Thank you for keeping our Washington students STEM Strong.

-Erika Wagner  
6403 Brooklyn Ave NE  
Seattle, WA 98115

**From:** Jennie Colgan [[mailto:jennie\\_colgan@sumnersd.org](mailto:jennie_colgan@sumnersd.org)]

**Sent:** Thursday, June 26, 2014 7:08 PM

**To:** SBE

**Subject:** feedback on new 24 grad requirement

Hello. I am a counselor in Bonney Lake, WA and have worked in the field for 17 years. While I am a proponent of raising the bar for students in terms of expectations, I am not in favor of the new 24 credit graduation requirement. I feel that students, teachers, and counselors are already expected to meet a high standard and an ever changing goal post. Just in the testing arena, an example being the state testing changes from WASL to HSPE, to now Smarter Balance, 2 math EOC's to 1, No science EOC to yes Science EOC. It is daunting for students, especially those with any out of the ordinary circumstances (as if adolescence isn't enough) to complete 24 credits. At our high school we are on a 6 period day which means that for a student to graduate there would be no allowance to fail a class. If our goal is to increase graduation rates, I'm not sure that we're going in the right direction. It is so much work as it is for many of our students to meet the current 22 of 24 credit requirement. My concern is that when students see that there is no "wiggle room", their HOPE for graduation will seem less likely and I feel that with the new requirements, both testing and credits, will decrease the graduation rate.

I have had students miss school which led to a loss of credits due to various reasons such as not understanding the material, having to leave school due to an abusive relationship with another student, mental health issues such as suicide attempts, eating disorders, depression; being out ill due to health issues such as diabetes and mononucleosis. This doesn't even account for missed school due to homelessness, parental drug/alcohol addiction, and these are just to name a few. I am concerned that there isn't much room for extenuating circumstances. This is in addition to the daily struggles I see from students who are in special education, working below grade level and challenging themselves in AP courses.

My other concern is whether schools are on a level playing ground. For example, a student is able to earn more credits simply based on the type of schedule a school offers. We use to offer a four by four which meant that students could earn 8 credits in one year which meant at the end of four years they could earn 32 credits. With that type of schedule it doesn't seem unrealistic to earn 24 out of 32 credits. Due to funding, we moved to a six period day model which means in four years students can only earn 24 credits, the amount required to graduate. So basically two students at different schools can earn different amount of credits based on the school they attend, which in turn influences the graduation rate, even though they

attend school the same amount of hours per day and year. I'm not sure how this inequity will be addressed.

I don't normally send emails or letters but at least wanted to provide some feedback from my perspective. I recently attended the WSCA/OSPI conference which encouraged me to share feedback.

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Jennie Colgan  
Junior Counselor (T-Th)

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June 30, 2014

Dr. Kristina Mayer, Chair  
Washington State Board of Education  
600 Washington Street, SE  
Olympia, Washington 98504

Dear Dr. Mayer,

On behalf of Washington STEM's Board of Directors, I am writing to share the following comments on the proposed rules for E2SSB 6552, *an act relating to improving student success by modifying instructional hour and graduation requirements*.

First, Washington STEM commends the Washington State Board of Education for its leadership on redefining high school graduation requirements. Based on your efforts and collaboration with state legislators, Washington students will now graduate better prepared to succeed in their chosen path after high school and with a stronger foundation in the subjects of science, technology, engineering, and math (STEM). Thank you for recognizing that in the 21<sup>st</sup> Century, all students need STEM competencies to graduate career- and college-ready and to participate in our democracy and high-tech economy.

As you finalize the implementation rules, we urge you to maintain the STEM foundation in the state's graduation requirements through two recommendations:

1. **Protect the core 17 graduation requirements from the “unusual circumstances” waiver process.** In today's economy and complex world, it is essential that every young person graduate with at least three math and three science credits as outlined in the core 17 requirements. New options for cross-crediting Career and Technical Education courses offer students flexibility for meeting these essential requirements.
2. **Preserve language in the rules stating that a student's chosen third credit of math must help prepare the student to meet standards for graduation under the state's assessment system.** We fully support the State Board of Education's goals to both respect students' flexibility and graduate students ready to thrive in careers, college, and life.

Thank you for your consideration, leadership, and service.



Sincerely,



Dean C. Allen

McKinstry CEO and Washington STEM Board Chair

*Signed on behalf of the Washington STEM Board of Directors*

**Bradford L. Smith**

General Counsel and Executive Vice President, Legal and Corporate Affairs, Microsoft  
Washington STEM Board Vice-Chair

**Bill Lewis**

Chairman, Lease Crutcher Lewis  
Washington STEM Board Treasurer

**Dr. Susan Enfield**

Superintendent, Highline Public Schools  
Washington STEM Board Secretary

**Dr. Elaine Beraza**

Superintendent, Yakima School District  
Washington STEM Board Member

**Mike Delaney**

Vice President of Engineering, Boeing Commercial Airplanes, The Boeing Company  
Washington STEM Board Member

**Barbara Hulit**

Senior Vice President, Danaher Business System, Danaher Corporation  
Washington STEM Board Member

**Phillip C. Ohl, PE**

Chief Operating Officer, Kurion, Inc.  
Washington STEM Board Member

**Elizabeth Tinkham**

Senior Managing Director, Accenture  
Washington STEM Board Member

cc: Washington State Board of Education Members and staff

