

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

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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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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.

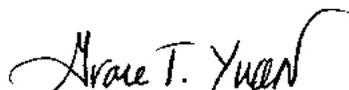
As noted above, districts already have their own, locally created processes for the HSBP. Aside from the State mandate that students must have a HSBP, all procedures associated the HSBP are under local control. The Legislature has reconfirmed this decision by not amending the provisions governing the 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.

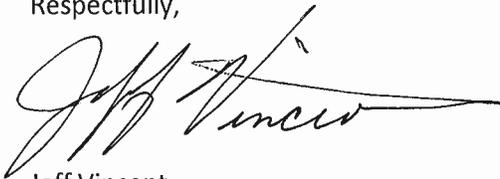
**Student Equity:**

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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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,

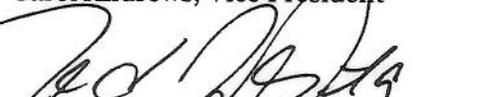
Everett Public Schools Board of Directors



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.

--

Jennie Colgan  
Junior Counselor (T-Th)

---

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*.

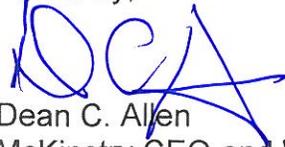
First, Washington STEM commends the Washington State Board of Education for its leadership on redefining high school graduation requirements. Based on your efforts and collaboration with state legislators, Washington students will now graduate better prepared to succeed in their chosen path after high 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



Superintendent's Office  
200 North Bernard Street  
Spokane, WA 99201-0282

phone (509) 354-7364  
fax (509) 354-5965  
www.spokaneschools.org



June 5, 2014

Board Members  
Washington State Board of Education  
P.O. Box 47206  
Olympia, WA 98504  
[sbe@k12.wa.us](mailto:sbe@k12.wa.us)

Re: Concerns Regarding Proposed Rules to Implement E2SSB 6552

Dear State Board Members:

We are submitting this letter in lieu of providing public comment at the June 6 Forum at the OSPI Building in Olympia regarding the proposed rules to implement E2SSB 6552. Section 202(d)(i) of that Act provided, in pertinent part:

*"The state board of education shall adopt rules to implement the career and college ready graduation requirement proposal adopted under board resolution on November 10, 2010, and revised on January 9, 2014, to take effect beginning with the graduating class of 2019.... The rules must include **authorization for a school district to waive up to two credits for individual students based on unusual circumstances and in accordance with written policies that must be adopted by each board of directors** of a school district that grants diplomas. The rules must also provide that the content of the third credit of mathematics and the content of the third credit of science may be chosen by the student based on the student's interests and high school and beyond plan with agreement of the student's parent **or** guardian **or** agreement of the school counselor **or** principal." (Emphasis added)*

Our concerns are four-fold:

1. Proposed WAC 180-51-068(12) incorrectly restricts the waiver of up to two credits to the 7 non-core subjects, which is contrary to the language and the intent of the statute. I believe you and Assistant Attorney General Colleen Warren are in receipt of a letter from one of the ranking members of the House Education Committee making this same point. We as a district should be the ones, as specifically authorized by statute to determine which courses and which circumstances would qualify for implementation of such a waiver.

2. Whereas flexibility is provided for students who do not meet the very specific requirements of the career and college ready framework if they happened to complete and pass all required International Baccalaureate Diploma Programme courses (proposed WAC 180-51-068(13), there is no such flexibility for the myriad of other practical circumstances that often arise. For example, we have well over 50 languages spoken in our district. Those students often arrive during high school and from programs where their courses do not align with the Washington Framework. Students who transfer from other states, who come from private and home school backgrounds from various places, or who take a year to study abroad on an AFS, Rotary, or other scholarship opportunities are placed in a sort of limbo with respect to whether they are entitled to graduate. Programs similar to IB exist as well; for example, Cambridge Curriculum is becoming established in Florida and certain metropolitan areas in other states.

Recently, the College Board has launched a national program for a new AP Capstone Diploma, six high schools in the state of Washington (5 of which are Spokane Public Schools) have been selected to be part of this national launch. For the six high schools in the state of Washington who will be offering this now AP Capstone Diploma, why would the exception only apply to the I.B. Diploma Programme?

The fact that you clearly carved out an exception for IB implies that you contemplated exceptions, but limited them to that one circumstance. So, additional clarity on how to handle students from these related types of situations would be welcome.

3. In proposed WAC 180-51-068(2)(a)(iii) and -068(3), with respect to choosing the content of a third credit of science or math, as with -068(12) on the two credit waiver, these rules would not implement the statute, but rather would amend it. The statute, quoted above, requires that the student obtain the agreement of his/her parent or guardian or of the counselor, or of the principal. It specifically requires the WACs to be consistent with that. But the proposed WACs have attempted to create an additional process whereby the agreement of the principal or counselor is permitted only if, "the parent or guardian is unavailable or does not respond to a request from the school for approval of a specific course."

Regardless of whether any of us might think it prudent to seek such parental approval, such an additional requirement was not part of the mandate from the legislature regarding this topic. Also, regardless of whether there might be portions of the Nov. 10, 2010 or Jan. 9, 2014 resolutions which some might desire to specifically preserve, E2SSB 6552 was specific in the last few sentences of Section 202(d)(i) regarding what the rules "must include" or "must also provide".

4. We believe the purpose of these requirements, as articulated in the January 9, 2014 Resolution, and their flexibility would both be enhanced if the CTE credit were to be characterized as a "Personal Pathway Requirement". You might deem it to be too late to take such an action because it was not characterized that way on Jan. 9, 2014 and you were charged with designing rules to implement that framework, subject to the terms of E2SSB 6552.

However, for students on a pathway to a 4 year college degree, the CTE requirement can often pose an impediment rather than serve as an enhancement. I would note:

- (a) The 4 year state universities in WA do not require a CTE course for admission;
- (b) I am not aware of any private universities or colleges that impose such a requirement;
- (c) As a practical matter in a student's career, when the student is trying to fill their schedule with the courses that actually will enhance their chances for admission at the university of their choice, the CTE course they get is often based primarily on scheduling availability. As a result, rather than serve a function of broadening the student's horizons or help them develop a useful skill, it becomes just a place-holder.

These problems would be eliminated if the credit were to be treated as a Personalized Pathway Requirement.

Thank you for your consideration on all four of these topics.

Sincerely,



Shelley K. Redinger, Ph.D.  
Superintendent

Cc: Spokane Public Schools Board of Directors  
WASA, President & Executive Director  
WSSDA, President & Executive Director  
Marcie Maxwell, Senior Policy Advisor, Governor's Office  
Senator Andy Billig  
Senator Michael Baumgartner  
Representative Marcus Riccelli  
Representative Timm Ormsby  
Representative Kevin Parker  
Representative Jeff Holy



July 7, 2014

Dear State Board of Education members and staff,

Thank you for the opportunity to comment on the proposed rules to implement E2SSB 6552. I am writing to address concerns regarding statements in a letter submitted by the School Alliance on July 1, 2014 ("SA Letter").

- 1) *Section I of the SA Letter references part of the State Board of Education (SBE) January 2014 resolution but uses an incomplete excerpt that could be misleading.*

The SA Letter claims that, based upon that resolution, "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." This excerpt is incomplete and leaves out a key clause. The referenced section of the January 9, 2014, SBE resolution reads:

"While students must attempt 24 credits, up to two of the 24 credits may be waived by local administrators if students need to retake courses to fulfill the 17 core state requirements *that all students must meet...*" (emphasis added).

- 2) *The SA Letter throws out a vague warning that "Potentially [restricting waivers to the Core 17 credits]... could lead to a decline in graduation rates" without any research cited. In fact, there is research supporting the opposite.*

Studies show that increasing rigor and providing support engages students and results in lower failure rates, even for the lowest achievers. (See end notes.)

- 3) *The SA Letter cites incomplete language from E2SSB 6552. The omitted language makes clear that waivers are not to come from core credits.*

The SA letter seems to imply that legislative intent was to allow the 2 credit waiver for any of the 24 credits. The SA Letter singles out the second part of the relevant section without mentioning that the first part of the section explicitly refers to two SBE resolutions that make clear that waivers cannot come from Core 17 credits. The clause cited is E2SSB 6552, Sec. 202(1)(d)(i), which reads:

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

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

The SBE resolutions explicitly referred to by the Legislature make it very clear that waivers cannot come from core credits. The Legislature directs the SBE to adopt rules in accordance to the frameworks laid out in the aforementioned Board resolutions (which, again, make clear that waivers cannot come from core credits). If the Legislature wanted a different framework than the one they directed to be implemented, they presumably would have specified that in the legislation – they did not.

The SA Letter tries to claim that the Legislature created a new waiver in the law. If the Legislature intended to create a new waiver, it seems reasonable to assume they would have explicitly rejected the one they referenced in the same section – again, they did not.

4) *The SA Letter makes claims about legislative intent that could be misleading.*

First, legislative intent should only come into play if the letter of the law is unclear. Respectfully, it seems that the letter of the law is clear.

Second, by the admission of many legislators, E2SSB 6552 was contentious and came down to the last moments of the 2014 session. In their haste to pass the legislation, it seems that at best, there may have been some confusion. I am aware that you have received a letter signed by thirty-some legislators from the House. I would respectfully assert that one-third of one chamber does not constitute legislative intent.

5) *The SA Letter suggests that legislator comments at the June 6, 2014, forum clearly supported one perspective, which is not accurate.*

The SA Letter references comments made by Rep. Hunt and Rep. Reykdal at the June 6, 2014, SBE forum and implies that their comments clearly support the idea that the Legislature’s intent was to make the two-credit waiver applicable to all 24 credits. I attended the forum and observed that Rep. Hunt and Rep. Reykdal made comments that could be used for both sides of this debate. A full reading of the transcript shows that Rep. Hunt and Rep. Reykdal made statements that the debate was rushed, there was a lot of disagreement, and that the intent was to get students to take 3 credits of math and science, if not more, and to generally increase academic rigor.

The Legislature authorized the SBE to establish high school graduation requirements, then carved some of that authority back out by creating an opportunity to weigh in during a regular legislative session, and took that opportunity to weigh in this past session. The manifestation of the Legislature weighing in is E2SSB 6552.

Given that a) the letter of the law is clear, b) the Legislature already weighed in and provided clear language, and c) there is no consensus supporting this version of legislative intent claimed after the fact, opening up waivers to the entire 24 credits would require a change to the law.

6) *The SA Letter inaccurately suggests that implementation of the high school graduation requirements is an unfunded mandate.*

The Legislature allocated \$97 million for implementation of the new high school graduation requirements. More than 100 school districts already require 24 credits or more for graduation. More than 100 additional school districts require 22 credits or more. This is not an unfunded mandate.

7) *The SA Letter seeks to reduce parent engagement to less than what is currently required and makes significant assumptions.*

Current law requires a meeting with parents and school staff if a student is opting out of Algebra II, as well as written acknowledgement that the meeting took place. Given the additional funds allocated for implementation and the desire of most parents to be aware of their student's course selection, it makes no sense to weaken parent engagement.

The SA Letter argues that it would be duplicative to have an approval process if the third math/science is designated in the student's High School and Beyond Plan (HSBP). That would be true IF parent signoff is consistently and specifically required for the HSBP, which is not the case. The only mention of parent involvement I was able to find is in the current proposed rules in question but it only says that "students shall create their high school and beyond plans in cooperation with parents/guardians and school staff;" it does not require parental signoff or define what that cooperation would look like.

8) *The SA Letter characterizes common practice around planning for high school courses as an overreach of SBE authority.*

Unless there are extenuating circumstances or a very poorly run school, course scheduling for 9<sup>th</sup> grade should begin in 8<sup>th</sup> grade, if not before. If a high school student is selecting their courses in the same school year he/she is taking them, something has probably gone wrong. The inclusion of middle school students in the proposed rules is simply doing as the legislature directed the SBE to do, i.e., implementing high school graduation requirements.

9) *The SA Letter proposes a waiver of one math and one science credit, which still decreases rigor and supports the position that the SBE indeed has authority in this area.*

The idea suggested in the SA Letter of allowing a waiver for one math and one science course would still result in the same or less rigor than the current high school graduation requirements. Our current high school graduation requirements specify that a third year of math must be taken and that two science courses be taken. This proposal also leaves open other core credits like English and social studies being waived, which is not currently allowed.

Additionally, the SA Letter claims that the SBE does not have the authority to restrict the waivers while simultaneously advocating for a proposal that does just that. This proposal reinforces the fear many of us have that the waivers will be used to absolve districts of their duty to educate all children, including the ones for whom certain classes may be difficult.

Thank you for your service on behalf of our children. I am hopeful that you will implement E2SSB 6552 with fidelity to our shared goal of a meaningful high school diploma and increased academic rigor for all our students.

Respectfully,

Amy Y. Liu  
Policy Director

## END NOTES

1. Clifford Adelman, Answers in the Tool Box: Academic Intensity, Attendance Patterns, and Bachelor's Degree Attainment (Washington, D.C.: U.S. Department of Education Office of Educational Research and Improvement, 1999).
2. Peter D. Hart Research Associates/Public Opinion Strategies, Rising to the Challenge: Are High School Graduates Prepared for College and Work? A Study of Recent High School Graduates, College Instructors, and Employers (Washington, D.C.: Achieve Inc., February 2005).
3. The Education Trust-West, The A-G Curriculum: College-Prep? Work-Prep? Life-Prep - Understanding and Implementing a Rigorous Core Curriculum for All (Oakland, California: The Education West-Trust, 2004).
4. Clifford Adelman, Principal Indicators of Student Academic Histories in Postsecondary Education, 1972-2000 (Washington, D.C.: U.S. Department of Education, Institute of Education Sciences, 2004).
5. Anthony P. Carnevale and Donna M. Desrochers, Connecting Education Standards and Employment: Course-taking Patterns of Young Workers (Washington, D.C.: Achieve Inc., 2002)
6. Shireman, Robert, Rigorous Courses and Student Achievement In High School: An Options Paper for the Governor of California, (Center for Studies in Higher Education, Berkeley, CA 2004).
7. Cooney, Sondra and Bottoms, Gene. Research Brief: Middle Grade to High School: Mending a Weak Link. (Southern Regional Education Board, Atlanta, GA, July 2002)
8. National Council of State Legislatures, Improving High Schools Through Rigor, Relevance, and Relationships. Available at: <http://www.ncsl.org/research/education/dropout-prevention-dropout-reporting-high-school.aspx>, accessed on July 7, 2014.

# DEMOCRATS **WA** *for* EDUCATION REFORM WASHINGTON

July 3, 2014

On the fiftieth anniversary of the signing of the Civil Rights Act, it is a good time to reflect on the impact that Washington State policies have on educational opportunity and equity. In that spirit, I offer a story, a few realities, and a plea to adopt high school graduation rules that put the needs of students first so that every Washington child receives an effective education.

A Story: My parents did not finish college. But I did. After graduating, I joined VISTA, the domestic arm of the Peace Corps where I worked in a maximum-security juvenile correctional facility in Columbia, South Carolina. My last 36 years of work in the juvenile justice and public education spheres has been for the same group of kids. Low-income children. Black children. Brown children. Too often, we expect less of these kids, and we give them less of what they need to be successful, and then they up in our criminal justice system. I know because I was their juvenile court public defender.

## Realities

- WA has [a lower college enrollment rate for 18-24 year olds](#) than low-performing states such as Alabama, Georgia, and Mississippi.<sup>1</sup>
- WA cannot produce enough workers for our high tech economy, so we are a national leader in the [number](#) and per capita growth of H1-B visas.<sup>2</sup>
- A student born into the top quartile of family income is about nine times more likely to earn a BA than another student born into bottom quartile.<sup>3</sup>

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<sup>1</sup><http://www.higheredinfo.org/dbrowser/index.php?submeasure=331&year=2009&level=nation&mode=graph&state=0>

<sup>2</sup> <http://www.myvisajobs.com/Reports/2012-H1B-Visa-Category.aspx?T=WS>

<sup>3</sup> <http://www.postsecondary.org/topicslist.asp?page=1&od=&search=Degrees%20awarded>

- Local control can lead to unequal opportunities. Consider [Seattle](#), where high schools with more affluent families literally established their own, higher graduation requirements.<sup>4</sup> At last count, there were four different sets of high school graduation requirements in the Seattle school district. See [Nathan Hale v. Rainer Beach](#)<sup>5 6</sup> Proof positive that when the expectation bar is low, poor kids are shortchanged.
- There is enormous demand on the part of low-income students and families for a college education. Over 150,000 low-income 7<sup>th</sup> and 8<sup>th</sup> graders and their parents have signed up for a [College Bound Scholarship](#), which covers the full cost of college tuition for four years, and a yearly stipend for books.<sup>7</sup> Dream Act eligible scholarship applicants are also exceeding projections.

The Plea. As you make your rule making decisions on 6552, please consider the thousands of low-income College Bound and Dream Act students and families who no longer have to worry about the prohibitive cost of college. It will be a sad day when they graduate from a WA high school with a full ride college scholarship that they can't use because their school district (or school, in the case of Seattle) did not expect enough of them. High school course-taking matters, especially for students who do not come from privilege, or college-going households. Please keep the current flexibility in the framework, and please keep the waivers confined to the seven electives, so that our Dream Act and College Bound students have a fighting chance at educational equity and opportunity.

Thank you.

Respectfully,

Lisa Macfarlane

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<sup>4</sup><http://www.seattleschools.org/modules/cms/pages.phtml?pageid=211670&sessionid=a3a387aafa8d936299a6c815e0390498>

<sup>5</sup> [http://halehighschool.info/grad\\_requirements/grad%20requirements2015\\_revised.pdf](http://halehighschool.info/grad_requirements/grad%20requirements2015_revised.pdf)

<sup>6</sup><http://rainierbeachhs.seattleschools.org/modules/cms/pages.phtml?pageid=176769&sessionid=b0d453b9ad1e630a336fa2ae4c692741&sessionid=b0d453b9ad1e630a336fa2ae4c692741>

<sup>7</sup> <http://www.wsac.wa.gov/college-bound>

Additional Public Comment on Proposed Rules to E2SSB 6552  
July 7, 2014

**From:** Rolfes, Sen. Christine [<mailto:Christine.Rolfes@leg.wa.gov>]  
**Sent:** Monday, July 07, 2014 3:23 PM  
**To:** Ben Rarick; SBE  
**Cc:** Dammeier, Sen. Bruce; Steve Litzow ([stevel@altusalliance.com](mailto:stevel@altusalliance.com)); Lytton, Rep. Kristine; Owens, Linda  
**Subject:** SB 6552 Comments

Dear Members of the State Board,

As one of the prime sponsors of Senate Bill 6552, I wanted to briefly share with you my impression regarding the legislative intent surrounding the local district waiver of not more than 2 credits of the 24 credit requirement.

During the course of the debate, there were concerns raised that one negative impact of more stringent graduation requirements would be an increase in the drop-out rate for students in personally challenging situations who might find it impossible to retrieve lost credits. Foster children and homeless teens were two groups specifically cited by legislators. While the issue was raised in the Senate, it was a particular concern for House members, and became a major point of contention in that body.

Whether these credits would be allowed from the Core 17, or whether they would be limited to the personalized pathway and elective credits was not discussed in detail. The key assumptions behind the language adopted were that the waiver for not more than 2 credits would be limited to exceptional circumstances and limited to the purpose of encouraging at-risk teenagers to continue their schooling rather than to give up. The decision regarding what might comprise an extenuating situation was purposefully delegated to individual school districts to determine.

Should the State Board choose to be specific regarding where the credits may be waived, please keep in mind one additional legislative goal behind this legislation. The legislation was broadly supported in both chambers in part because of the renewed focus that it brings to career and technical training – allowing students greater access to pursue their interests and goals.

Regardless of the direction that the SBE takes, I encourage the Board to carefully track where the waivers are requested and where they occur. This may be helpful in refining our shared policy work in the future.

Thank you for considering these comments,

State Senator Christine Rolfes, Legislative District 23

**From:** [DRJLEO@aol.com](mailto:DRJLEO@aol.com) [<mailto:DRJLEO@aol.com>]

**Sent:** Thursday, July 03, 2014 3:47 PM

**To:** Ben Rarick

**Cc:** [kris@klmayer.com](mailto:kris@klmayer.com)

**Subject:** Re: Career and College-Ready Graduation Requirements

Ben:

I read the agenda for the upcoming SBE meeting in Spokane and noted that there were two discussion and action items that really caught my attention, the rules making on SB 6552 ( graduation requirements) and the work of the Student Discipline Task Force. The task force because I am a member of the committee and both issues since I am a member of the EOGOAC.

I am, however, writing you as the Chairman of the Seattle Breakfast Group' Education Committee, to share our position on the 2 credit waiver issue since I am unable to attend the meeting in Spokane and make an in person public statement.

By way of introduction of our organization, **The Breakfast Group** is a 501(c)3 non-profit organization of civic minded professional African-American men dedicated to mentoring and addressing the challenges of at-risk youth of color focusing on black males. Established in 1976, it is the oldest (non-fraternity) all male African-American organization in the Northwest United States. It targets young males in the community who have been or are on the verge of being expelled from the public school district. The organization specializes in delivering high impact results driven programming and mentorship to low-income youth, with a focus on African-American males.

**The Breakfast Group** members value a consistent, competent, and reliable presence in the lives of the youth they serve. This is accomplished by demonstrating a sustained and active commitment to their community. In this way they empower low-income male youth by imparting the values of: responsibility, leadership, and accountability. They are committed above all, to developing educational experiences and initiatives that close and address the achievement gap for low-income minority and at risk male students.

The membership with its combined expertise, professional experience, political capital, and range of practice is essential to its Unique Value Proposition. The members include practitioners in the fields of: Education, Business, Public Service, Law, Medicine, Entrepreneurship, Science, and Technology. This unique, distinguishing characteristic of **The Breakfast Group**, combined with its *37 year track record of success*, is without parallel in the Seattle Metropolitan Area and the State of Washington.

The primary focus of the organization is to provide support for low-income youth of color in achieving their educational objectives. The emphasis of **The Breakfast Group** is to work directly with the community's highest risk young men. Furthermore, to assist them in completing their secondary education and access higher education and/or employment after high school as they move forward with determination and integrity toward adulthood.

Targeted categories include youth susceptible to; gang activity, violence, drug involvement, and classroom disruption. These behavioral patterns lead to a failure to make progress towards graduation. More than 50% of the students participating in **Breakfast Group** programs have been exposed to the juvenile justice system.

An additional objective of the organization is to continue to work with youth and families in the community to achieve the highest levels of education and economic opportunities.

Given the above introduction about our focus, we strongly feel every effort to keep graduation requirements at the highest possible level, is part of the paramount duty of the state to provide an education structure that will enable all kids to meet academic requirements and graduate either college ready or career ready. There are three points that I want to make on behalf of our organization:

- 1) It is essential that SBE protect the Core 17 credits and not allow them to be waived.
- 2) Limit the waivers by percentages or numbers and ensure that there is not a disproportionate impact for students of color, low-income, FLR status, ELL students, foster kids, homeless kids, or students receiving special education services, and special education status.
- 3) Make public: how many students are getting waivers; the demographic information for those students (including at least race and gender, FRL status, ELL status, and special education status) and even more disaggregate data if available; where credits are being waived; and the reasons for those grants.

Another thought I would like to share. Given the position that all entities are taking relative to the intentional disbursement of funds as a result of the McCleary lawsuit, I wonder if allowing more local control of graduation requirements, especially the core requirements, how intentional will dollars be able to be disbursed to school districts when you wouldn't necessarily have the consistency in the application of the rules relative to the graduation requirements.

Finally, I hope everyone keeps in mind the connectivity between the graduation requirements, assessment testing, graduation rates, drop-out rates, the disproportionate discipline rates, the pipeline to the juvenile justice system and last but not least, the achievement/opportunity gap.

I apologize for the long e-mail, but felt it was imperative for you and the board to hear the voice of the communities of color and in this instance, the African American Community.

Regards,

Dr. James B. Smith

Chairman of the Seattle Breakfast Group Education Committee

425-413-7176

**From:** Vandana Slatter [<mailto:vandanaslatter@cs.com>]

**Sent:** Sunday, July 06, 2014 1:00 PM

**To:** SBE

**Cc:** Dr. Greg Slatter

**Subject:** Re: SB 6552-24 Credit Graduation Requirements

Thank you for the opportunity to submit below comment during the public comment period re: SB 6552 - 24 Credit Graduation Requirements:

Dear State Board of Education members:

Thank you for your work on the proposed rules for the implementation of the College and Career Ready Diploma. We are proud parents of a high school student who has been successful in the general education curriculum with support from an IEP. This support & accommodation has given his teachers needed tools to help him to complete his work successfully at each grade level; and provides the opportunity for him to attend college after graduation, and ultimately a future with multiple post-secondary/career options.

This work comes at an opportune time as the US Department of Education just listed Washington State as being in need of assistance for improving outcomes for students in special education. Improving outcomes for these valuable students starts with promoting high expectations for ALL students. We recognize that in addition to high expectations we must also ensure our education system operates in such a way to minimize the impact a student's disability has on their education. Access to general education and curriculum, appropriate supports, accommodations and universally designed systems will minimize the impact a student's disability has on their education. It is incredibly important that Washington's diploma has explicit and well-understood meaning to all students, their families, future employers and post-secondary institutions. With that in mind we offer the following suggestions:

1. Limit waiving of credits that would impact the value of the college and career ready diploma. For any waivers, require a parent or guardian signature. By requiring a signature you provide a safeguard to ensure a student and their parent or guardian understands the impact waiving the required credit may have on the student's post school opportunities.
2. Reinforce that all students, including those in special education have a high school and beyond plan. A parent should be required to sign off on the high school and beyond plan. In some limited circumstances, a student's IEP and transition plan will be an appropriate substitution for a high school and beyond plan. It is important that a parent is included in that decision and signs a document providing consent and understanding. Often students in special education are tracked early on a path that can have lasting impact on their postsecondary education opportunities, employability and earning potential. We must safeguard against these students becoming disconnected from valuable guidance and services in place for general education students.
3. Develop a parent friendly information document clearly detailing decision criteria used in waiving credits and/or pursuing a different type of diplomas. It should be clear how postsecondary institutions and employers might view these changes to Washington's College and Career Ready Diploma.

Thank you for your consideration and for the work you do for all students in Washington State.

Sincerely,  
Drs. Greg & Vandana Slatter  
Bellevue (LWSD)

Note: Letters with the same content were also received by Grace Drone of Bellevue and Ana Laura Torres.

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

From: Gloria Butts [<mailto:gbutts431@yahoo.com>]

Sent: Wednesday, June 25, 2014 5:20 AM

To: SBE

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

Dear Mr. Archer,

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

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

1. Restrict credits that may be waived to electives.

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

2. Define "unusual circumstances."

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

3. Require transparency from school districts.

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

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

Gloria Butts

Federal Way 98003

Note: Messages with the same or similar content were also received from Betsy Cohen of Seattle, Patsy Treece of Bellevue, Frankie Jorgensen of Tumwater, Karen Albers of Richland,

Julissa Crow of Pasco, Alice Lawson of Shoreline, Eloise Sparks of Kennewick, Kathy Habib of Bellevue, Lynn Tucker of Seattle,

**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

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:** Sarah Butcher [<mailto:psbutcher@comcast.net>]

**Sent:** Monday, July 07, 2014 6:40 PM

**To:** SBE

**Cc:** John Schwartz; Jennifer Karls; Susie Pietz; Theresa Nagle; marian terry; Paul and Sarah Butcher

**Subject:** Feedback on Proposed Rules to Implement E2SSB 6552

Dear Washington State Board of Education members and staff,

Thank you for the opportunity to provide comments in response to the proposed rules for E2SSB 6552.

The Bellevue Special Needs PTA Board of Directors appreciates the commitment and the work of the State Board of Education members on Washington's College and Career Ready Diploma. We recognize that this has been a long road and we request that careful consideration be given to how we ensure that each and every student has the opportunity to earn a diploma which prepares them for the next steps in their lives.

Washington's College and Career Ready diploma must have explicit and well-understood meaning and value to all students, their families, future employers and postsecondary institutions. Students with special needs and disabilities are a diverse group of students and they present a unique challenge to our education system. It is important to remember that while some students may require flexibility as to how they meet the high school graduation requirements, the vast majority of them are students whose disabilities should not interfere with them attaining the same standards and outcomes as students without disabilities. The key is that those students receive access to the general education curriculum with the supports and accommodations needed to reduce any barriers to learning due to their disability.

It is incredibly important that with flexibility we also have strong oversight and transparency. When a student does not have the opportunity to meet the requirements for a standard diploma the effect on their life and post school opportunities can be far reaching. They are likely to be limited in their post-secondary education opportunities, employability and earning potential. This is the opposite of college and career ready.

With that in mind, we offer the following suggestions on the proposed rules:

1. 1. Strengthen language within the rules to ensure parent involvement and awareness of any decision to deviate from the standard diploma track and high school graduation requirements. Thorough parent involvement should include:
  - Providing information in a parent's preferred language.
  - Explaining the impact waiving the required credits may have on a student's ability to graduate adequately prepared for their post secondary goals.
  - Requiring a parent signature on any waiver of required graduation credits.
  - Developing and providing a parent friendly information document clearly detailing decision criteria used in waiving credits and/ or pursuing a different type of diploma. It should be clear how postsecondary institutions and employers might view any changes to Washington's College and Career Ready Diploma.
  -

We also request that the state collect, report and review the number and percentage of students seeking modifications and waivers to Washington's College and Career Ready

diploma. By tracking this information we can ensure that flexibility is used in limited and appropriate ways and those students using the waivers and their families truly understand the impact this will have on their readiness for their postsecondary goals.

2. Strengthen language within the rules to ensure that students in special education have access to the high school and beyond plan. The high school and beyond plan can be a protection against special needs students being tracked onto a path that removes the opportunity for receiving a college and career ready diploma. Students with disabilities are general education students first and yet, they often become siloed and separated from many aspects of general education. It is incredibly important that language is explicit and clear that each and every student should have a high school and beyond plan, including those in special education. We support the need to begin the process of a high school and beyond plan in middle school as the course sequence that keeps a student on track to graduate high school begins early. We also appreciate the flexibility allowed within a student's personalized pathway, but request clear parameters on what that can look like and a clear expectation for parent and student involvement in its development. There will be limited times when an IEP team, with the agreement of the parents, decides that a student's transition plan within their IEP is an appropriate replacement of a high school and beyond plan. In that instance we ask that there is a specific document that families need to sign waiving out of the requirement for a high school and beyond plan. It would be valuable to track all students that are waiving out of the high school and beyond plan to better understand the demographics of that group and make sure it only happens in appropriate circumstances.

We thank you for this opportunity to provide feedback on this valuable work. We must ensure that our policies are delivering on our promise to make all students college, career and life ready in Washington State. Thank you for your continued service to our students.

Sincerely,

Sarah Butcher  
VP Advocacy  
The Bellevue Special Needs PTA



## Washington State Legislature

July 7, 2014

**To:** Dr. Kristina L. Mayer, Chair, Washington State Board of Education  
Washington State Board of Education Members

**Re:** State Board of Education Rules to implement Engrossed Second Substitute Senate Bill 6552 (2014)

Dear Chair Mayer and Board Members,

We are writing to express our support for the State Board's proposed rules to implement Engrossed Second Substitute Senate Bill 6552 (E2SSB 6552) as passed by the Legislature in the 2014 legislative session with strong bipartisan, bicameral support. We urge you not to make substantive changes to your rules. We strongly endorse your approach and the specific language you have chosen to implement the authority that the Legislature has granted to the Board.

We specifically want to highlight our strong support on the following five issues:

1. **The two credit waiver for individual students.** In section 202 of E2SSB 6552, the Legislature clearly directed 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 rules must include authorization for a school district to waive up to two credits for individual students based on unusual circumstances. . ."

When reviewing the two resolutions by the Board, it is clear that the January 9<sup>th</sup> resolution added additional clarity to the November 10<sup>th</sup> resolution, as shown below:

- SBE Resolution - November 10, 2010: "While students must attempt 24 credits, up to two of the 24 credits may be waived by local administrators if students need to retake courses to fulfill the state requirements."
- SBE Resolution - January 9, 2014: "While students must attempt 24 credits, up to two of the 24 credits may be waived by local administrators if students need to retake courses to fulfill the 17 core state requirements that all students must meet."

By using the specific reference in section 202 to the State Board's January 9<sup>th</sup> resolution, the Legislature clearly indicated that the waiver would align with that resolution and be applied only to those credits outside of the 17 core requirements that ALL students must meet as designated by that resolution.

We disagree with those who have expressed concern that the State Board's rule in this area does not provide flexibility. We believe the waiver does provide flexibility and more importantly also maintains a standard minimum of knowledge and skills that students must obtain in order to earn a meaningful high school diploma. It is also important to note that

this is not the only flexibility provided by the State Board for students and school districts to implement the new graduation requirements. There is additional flexibility provided to students by permitting one arts credit, world language credit, career concentration credit, and electives to be substituted according to a student's High School and Beyond Plan. Additionally there is flexibility provided to school districts to phase in the new graduation requirements beginning with the graduating class of 2020 or 2021, instead of the graduating class of 2019.

- 2. The model policy to be developed by the Washington State School Directors Association (WSSDA).** E2SSB 6552 requires WSSDA to "develop a model policy and procedure that school districts may use for granting waivers to individual students of up to two credits required for high school graduation based on unusual circumstances." Some have requested that the State Board delay the adoption of your rules until the WSSDA model policy is developed. However, this would be an inappropriate delay because the State Board's proposed rules do not affect the model policy and the model policy does not affect the proposed rules.

The model policy, as described in section 203 of E2SSB 6552 does not address "which" credits may be waived. Instead, the model policy is to provide how the credits may be waived, *i.e.*, what would constitute "unusual circumstances" and what procedures might a district want to adopt for the waivers in its written policies.

In contrast, the State Board proposes no rules defining or conditioning "unusual circumstances" for the purpose of the waiver of two credits. The determination of "unusual circumstances" is left entirely to the WSSDA model policy and the written policies adopted by the districts, as authorized by E2SSB 6552. The State Board rules merely address which credits may be waived by the local school district.

Additionally, there is a timing issue that precludes the State Board from delaying your rules until after the WSSDA model policy is distributed to school districts. Under section 203, the model policy must be distributed "to all school districts in the state that grant high school diplomas by June 30, 2015." Under section 202, the State Board is directed to "implement the College and Career Ready Graduation Requirement Proposal", which increases the state minimum high school graduation requirements from 20 to 24, to take effect beginning with the graduating class of 2019. The Courts have consistently found that an increase in graduation requirements must provide sufficient notice of the graduation requirements to entering freshmen students. The graduation class of 2019 will be the entering freshmen students in 2015. The rule making process generally takes a minimum of four to six months and includes public input. If the State Board delayed its rule adoption until after June 30, 2015, the current proposed rules would have to be refiled because the rules would not be completed within the timelines established for the rulemaking process. This would mean any new rules would have additional costs in time and funding. Additionally, the timeline for adopting any new rules may not provide sufficient time to obtain necessary public input. Moreover, the Board could be in danger of not providing sufficient notice to the incoming freshmen prior to the beginning of the 2015-16 school year.

### 3. **The role of the parent regarding the third credits in mathematics and science.**

We recognize that the State Board rules have always respected the role of the parent when it comes to determining the third credit of mathematics that a student will take. The previous rules adopted and continued for students entering the ninth grade on or after July 2009 through June 2012 provide the following:

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

The relevant language from E2SSB 6552 that mandates the primacy role of the parent(s)/guardians(s) regarding the third credits in mathematics and science is as follows:

“The State Board of Education shall adopt rules to implement the Career and College Ready graduation requirement proposal adopted under Board resolution on November 10, 2010, and revised on January 9, 2014, . . . 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.”

In E2SSB 6552 the Legislature maintained the priority for parent(s)/guardian(s) to agree on the student’s third credit of mathematics and also added the same priority for the third credit of science. Additionally, the Legislature narrowed to only the school counselor or principal as the school designee who could provide the necessary agreement when the parent(s)/guardian(s) are unavailable.

The State Board rules to implement E2SSB 6552 clearly follow the mandate for the primacy role of the parent(s)/guardians(s) regarding the third credits in mathematics and science; and appropriately specifies and limits the school designee who can agree only when a parent or guardian is unavailable or non-responsive, as follows:

“A third credit of high-school mathematics, aligning with the student’s interests and high school and beyond plan . . . with agreement of the student’s parent or guardian, or, if the parent or guardian is unavailable or does not respond to a request from the school for approval of a specific course, agreement of the school counselor or principal;”

### 4. **The State Board of Education’s authority to define the High School and Beyond Plan (HSBP).**

Under RCW 28A.230.090, the Legislature has specifically authorized the State Board of Education to “establish high school graduation requirements or equivalencies for students, except as provided in RCW 28A.230.122 and except those equivalencies established by local high schools or school districts under RCW 28A.230.097.”

In accordance with this language, the State Board has broad authority to establish the content of the high school graduation requirements and there are only two exceptions to this authority. First, under RCW 28A.230.122, the State Board must recognize that student

completion of the International Baccalaureate Diploma Programme satisfies the state minimum requirements for graduation. Second, under RCW 28A.230.097, the State Board must accept career and technical courses determined to be equivalent to academic core courses, in full or in part, by the high school or school district as meeting graduation requirements.

The State Board of Education has properly used this broad authority to establish the content of the high school graduation requirements to include the HSBP. The HSBP is not a part of the International Baccalaureate Diploma Programme, nor is it an "equivalency" established by local high schools or school districts, which are the only content exceptions provided in the State Board's authorizing statute.

5. **Legislation and statute interpretation.** As a final point, we note that when the language of legislation or the resulting statute is clear and unambiguous then under the rules of statutory interpretation it is inappropriate to look to the intent of individual legislators. The language in E2SSB 6552 is clear and unambiguous. Additionally, individuals often have differing interpretations resulting in many "legislative intents". So, when contemplating the legislative direction provided in E2SSB 6552 to the State Board, we encourage you implement the legislative direction using the plain and common meaning of the words and the broad authority given to you.

In closing we want to thank each of you for supporting the students in Washington state by implementing E2SSB 6552 with fidelity and flexibility while maintaining the necessary rigor to make the diploma meaningful to all students, parents, employers and post-secondary institutions.

Sincerely,



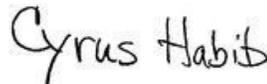
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41<sup>st</sup> Legislative District



Representative Kristine Lytton  
40<sup>th</sup> Legislative District



Senator David Frockt  
46<sup>th</sup> Legislative District



Representative Cyrus Habib  
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Representative Jeff Morris  
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Senator Mark Mullet  
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Representative Eric Pettigrew  
37<sup>th</sup> Legislative District



Representative Larry Springer  
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#### EXECUTIVE DIRECTOR

**Dr. Margaret Tudor**

July 8, 2014

Ms. Linda Drake  
Research Director  
Washington State Board of Education  
P.O. Box 47206,  
Olympia, WA 98504-7206

Dear State Board of Education:

As President of the Pacific Education Institute (PEI) and on behalf of PEI's Board of Directors, I am writing to support the rules on draft graduation requirements that reference "laboratory science" for a third credit. The third credit of science allows for laboratory science in "Outdoor Spaces" where students interact directly with the material world, using the tools, data collection techniques, models and theories of science. This third credit of science in "outdoor spaces" meets the intent of the Next Generation Science Standards for students to experience the scientific practices of a range of scientists. Government, private sector and university scientists in the natural resource sector typically design research requiring data collection in the outdoors, and use the data to make natural resource management (or engineering) decisions to problem solve a situation.

The Pacific Education Institute is uniquely qualified to advocate for the rigor and sound scientific methods of field investigation which is a set of scientific practices used by scientists in the field. PEI created the frameworks for field investigation that is now in Washington State science standards and is tested at the 5th, 8th and 10th grade levels. In addition the Next Generation Science Standards, adopted by Washington State, expect students to experience the scientific and engineering practices of professionals, and recognizes the field investigation methodologies.

PEI is led by a board of directors from leaders in the education sector and environment, agriculture and natural resource sectors. Our board is dedicated to ensuring that every K-12 student experiences science in the community settings (macro settings) outside the classroom. Science education needs to be balanced by studies in both the micro settings (available though built indoor laboratories with appropriate equipment), and the macro settings (where students use their observation skills and physical instruments to measure variables they can access in the environment).

The benefit of the laboratory option in the environment involving agriculture and natural resources is that this option, while being rigorous is also low cost and accessible for all students, guided by their prepared teachers. Professionals from the for-profit, non-profit and government sectors are eager to provide mentorship for students interested in Field STEM (Science Technology, Engineering and Math) studies and careers, by providing work-based experiences to learn science. PEI advocates that every student must have access to their community environment, agriculture and natural resources through science education to have a balanced understanding of science in the real world. The third option for laboratory science will ensure that every student has a signature field learning experience, guided by science learning progressions from elementary, middle to high school detailed in the Next Generation Science Standards.

Members of the PEI Board are ready to testify at the State Board of Education hearings in support of the third credit of science allowing for laboratory science in “outdoor spaces”. Please contact the Dr. Margaret Tudor, Executive Director of the Pacific Education Institute (360-705-9291) if you wish to have members of the Pacific Education Institute Board attend and testify at your meetings.

Sincerely,

A handwritten signature in cursive script that reads "William S. Taylor".

William Taylor  
President, Board of Directors  
Pacific Education Institute



**WASHINGTON  
ROUNDTABLE**

520 Pike Street, Suite 1212  
Seattle, WA 98101-4001  
phone (206) 623-0180  
fax (206) 623-6576  
[www.waroundtable.com](http://www.waroundtable.com)

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July 8, 2014

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

Dear Board Members:

Thank you for opening up the proposed rules to implement E2SSB 6552 to comments and feedback. The Washington Roundtable strongly supports the role of the State Board of Education in establishing which college and career ready graduation credits can be individually waived under the unusual circumstances criteria.

The Roundtable supports Section 12 of the proposed rule, which states that students may receive an individual two-credit waiver and notes that the two credits waived cannot be from one of the 17 required or core subject credits. The 17 mandatory credits include an increase in math and science required for graduation. Math and science represent the skills and expertise necessary for every Washingtonian to succeed in the modern economy.

To uphold the integrity of E2SSB 6552 and successfully prepare all students in Washington for college and career, we urge the Board to hold fast to its decision to limit the two-credit waiver to the seven credits outside of the core of 17. Each of the core 17 credit requirements is designed to put Washington students on par with their peers in other states, prepare them for the postsecondary option of their choice, and set them on a path to success and opportunity.

A 2013 study by Washington Roundtable and The Boston Consulting Group found 25,000 jobs, heavily concentrated in the STEM disciplines, had gone unfilled in Washington state due to a lack of qualified candidates. That number was projected to double by 2017. Washington state is not preparing enough of its students for postsecondary education and the great job opportunities that exist here.

Closing the skills gap will lead to opportunities for all of our students as well as our state. The career and college ready graduation requirements are a key piece of that effort. Washington must hold schools and students to the standards defined in E2SSB 6552 and addressed by the Board in Section 12 of the proposed rule. We urge the Board's continued support.

Regards,

Steve Mullin  
President

July 8, 2014

Dear Washington State Board of Education Chair, Dr. Chris Mayer, Board Members and Staff:

First I want to applaud and express my appreciation for your work in developing proposed rules to implement the significant legislation E2SSB6552 passed by our State Legislature in 2014 to ensure students will graduate from our high schools with a college and career ready diploma. I urge you to use your rule making authority and take the action at your July 9 meeting to ensure the Freshman class entering Washington State High Schools in 2015 will indeed graduate in 2019 with a meaningful diploma – one that ensures they are indeed college and career ready. The Legislature has taken the first step to ensure our students receive an education that prepares them for the demands of the 21<sup>st</sup> Century. You must now act at your July 9 meeting to make this a reality for the students who will graduate in 2019.

The arguments or the reasons being given for delaying your actions on the proposed rules at your July 9 meeting do not appear to be consistent with the unambiguous and clear language of E2SSB 6552. Our children cannot wait. Their future and our state's future can no longer be put on hold.

My second concern of equal importance to my plea to you to not delay acting on the rules is the waiver of two credits. I have ultimate confidence that you believe an excellent and equitable education is an imperative for all students in our state now and in the future. Sadly, that is not the case for the students of our State today. The Achievement Gap for minority and low income students is painfully real today putting college and postsecondary opportunities out of reach for these students. Ultimately this leaves our State now in the long run without the skilled workforce needed in STEM and/or related areas. To ensure equity and excellence for all our students, I urge that the two credit waiver be applicable to only credits beyond the 17 core state requirements.

Again, I am most grateful for your work in carrying out your responsibilities for the education of the students of the State of Washington. I hope the students of Washington State will be the winners of your deliberations and actions at your July 9 Board Meeting.

Sincerely,  
*Mona H. Bailey*

Mona H. Bailey  
Educational Consultant and Advocate  
Retired Deputy Superintendent, Seattle Public Schools  
Assistant State Superintendent of Public Instruction (1974-1986)