

CONCISE EXPLANATORY STATEMENT WAC 180-51-067

This document has been prepared in compliance with RCW 34.05.325, the concise explanatory statement requirement of the Administrative Procedure Act. Included are: (1) the reasons for adopting the rule, (2) a description of any differences between the proposed rule and the text of the final rule; and (3) a summary of all comments received, and responses to those comments.

1. REASONS FOR ADOPTING THE RULES

The State Board of Education (SBE) has been charged by the Legislature in RCW 28A.230.090 with establishing the state's graduation requirements for students attending public high schools. After an extensive three-year review and public outreach, the State Board of Education approved the Washington Career and College Ready Graduation Requirements in November 2010. The 24-credit framework reflects SBE's goal to: (1) prepare students for postsecondary education, gainful employment and citizenship, consistent with the basic education requirements of RCW 28A.150.220; (2) prepare Washington students at levels comparable to students in other states; (3) align better with entrance requirements at Washington's public postsecondary institutions; and (4) establish common, coherent, and rigorous graduation requirements that keep all options open for students after high school.

At its November 2011 meeting, the Board took the first step toward Career and College Ready Graduation Requirements by adopting into rule (WAC 180-51-067) only those changes determined by the Office of Superintendent of Public Instruction to have no fiscal cost. This included increasing the number of English credits from 3 to 4 and social studies credits from 2 ½ to 3 along with a reduction in the number of electives required from 5 ½ to 4. The new credit requirements specified in WAC 180-51-067 are intended to bring Washington's credit requirements in English and social studies more in line with the other 46 states that have established graduation requirements for public high schools, and insure that all students receive instruction in core subject areas critical to meeting the SBE's goal.

In addition, the graduation requirements were changed to make Washington State History and Government a noncredit requirement, giving districts flexibility to offer the course in middle and/or high school; create a "two for one" policy that will enable students taking a CTE equivalent course to satisfy two graduation requirements while earning one credit; and clarify that the two credits of Health and Fitness include .5 credits of health and 1.5 credits of fitness.

2. DIFFERENCES BETWEEN PROPOSED AND FINAL RULE

The Board made two changes to WAC 180-51-067 in response to public comments received during the rulemaking process. First, a new section was added to read:

A school district may obtain a two year extension from the effective date for the implementation of the 4 credits of English and/or the 3 credits of social studies required under this rule upon the filing of a written resolution by the district's school board with the State Board of Education stating the district's intent to

delay implementation of the increased English and/or Social Studies requirements effective for the class of 2016. The resolution must be filed by June 1, 2012. A district filing a timely resolution with the State Board of Education shall maintain the English, social studies, and elective credits in effect under WAC 180-51-066 for the period of the extension.

This change was made to accommodate school districts that might need additional time to make adjustments in staffing and curriculum necessary to implement the increased credit requirements for English and social studies. Second, in section (4)(b)(i), the word “and” was changed to “or”. This was intended to correct a typographical error that occurred in the proposed language. Other comments were considered by the Board but did not result in any changes to the rule as proposed for adoption.

3. SUMMARY OF ALL COMMENTS AND RESPONSES

To maximize opportunity for input prior to the graduation requirements rule revision language vote, the Board implemented a coordinated outreach campaign in September and October 2011. Staff and Board Members contacted key publics (e.g. WSSDA and school districts affected by the credit changes) directly. Staff also developed and delivered communications through website and social media updates, newsletters, and partner websites and publications. This resulted in the receipt of a significant amount of written public comment that varied in support and opposition to the proposed rule. Additionally, the Board received verbal comments at its meeting on November 9, 2011 in regards to the rule. The written and public comments and the Board’s responses are noted below.

I. General Public Comments¹

A. Support for Changes to the State’s High School Graduation Requirements

The Board received fifty-eight written comments from the general public supporting the changes to Washington State’s high school graduation requirements set forth in WAC 180-51-067. Additionally, five individuals spoke in support of the rule at the Board’s meeting on November 9. In summary, individuals providing comment urged support of the changes for the following reasons:

- It is not acceptable that more than 50% of our students require remedial courses to enter community college. Our system is making it so students have to pay for extra classes for things that they should have learned for free in high school if they want to go to college. The cost savings for our future which can come from these programs alone makes these changes a smart investment.
- In today’s globally competitive environment, it is critical that students earn a high school diploma, and imperative that their diploma prepares them for career and post-secondary pathways. The current structure of Washington’s 20 credit diploma doesn’t achieve this.

¹ The public comments and responses are divided into one of five categories as set forth in Section I. A-D. The Board received many of the same comments from School Districts that are categorized under Section II and responded to in Appendix B. The Board’s responses in Appendix B are also intended to apply to the comments set forth in Section I to the extent they respond to the same comment raised by a member of the public.

- Our state must take action to ensure more students graduate high school prepared for success in college and career. The no-cost provisions under consideration move the state in the right direction and begin implementation of a career and college ready graduation diploma.
- The change to allow the double credit in CTE classes is necessary as so many of these classes carry more than 1 teaching element in them. It gets hard to choose which credit to pick to have the class cover and seems redundant when the student is getting the standards for 2 or more classes covered in a single course.
- New, family wage job openings in Washington State will require an education or some training beyond high school. Washington's young people and our state's economy must be able to compete in a fast-growing, information-based fields including: biotechnology, health care, computing, aviation, material and environmental sciences. Our state must take action to ensure more students graduate high school prepared for success in college and career. The no-cost provisions under consideration move the state in the right direction and begin implementation of a career and college ready graduation diploma.
- Our system is making it so students have to pay for extra classes for things that they should have learned for free in high school if they want to go to college. Our future depends on making sure our students succeed.
- Students are provided different opportunities depending where their parents live. Tightening up graduation requirements will make the playing field in Washington State a bit more leveled when compared to districts who on their own require rigorous coursework from their students.
- Forty-five states require more English courses in high school than Washington and 39 require more social studies.
- We are facing an ever-increasing opportunity gap in our education system, and serious changes are needed now.
- Our future depends on making sure our students succeed. Our system is making it so students have to pay for extra classes for things that they should have learned for free in high school if they want to go to college.
- It is unacceptable for our educational system, and the achievements of our students to lag behind the national averages.
- Support the College and Work Ready initiative. It is critical that we provide the best opportunity and guidance in order to prepare students for working in the economy of the future.
- Our students need to be college ready when they graduate from high school. Their education should enable them to compete with other countries in the sciences, math and IT technology so we don't have to import workers on work visas to fill the employment opportunities with outside workers.
- Washington State students deserve to be able to graduate high school ready to enter college or university. It is unacceptable that the majority of students require remedial courses before they can begin their chosen career path. Changes to the graduation requirements will prepare our students for college and a future in the Washington State workforce. Our economy in Washington State depends on these students.
- Urge support for the changes to graduation requirements so that all students are more ready for college, especially low-income students who are smart and have potential but are vastly under prepared for college level courses.

- Feel strongly about changing the graduation requirements as too many students are not prepared for the needs of the 21st century.
- We need to raise our expectations of students.
- More should be required in terms of social studies, American history, world history, contemporary world affairs, and economics, not to mention civics are at least as important as Washington state history. The future of our country depends on a well educated citizenry.
- Increasingly, the jobs that pay "living wages" require college or serious vocational school course work. However, many of our students emerge from high school without the preparation they need for college or vocational school.
- We simply cannot wait to move forward in aligning high school exit with post-secondary entrance requirements — workforce training, two year college and four year college/university.
- The vast majority of districts already require 4 credits of English and 3 credits of social studies; this change is needed, affordable, and, most importantly, it is in the best interest of students.
- The proposed graduation requirements establish a career concentration as a default requirement and will provide the flexibility for students to prepare for their career of interest by concentrating in career and technical education coursework.
- Washington students are not prepared to compete with their counterparts nationally or internationally. This is evident in our NAEP, PISA, AP, and state standardized test scores and high two- and four- year college remediation rates.
- We import a high percentage of college graduates for many of our skilled family wage and technical jobs. Future education and family wage jobs are dependent on higher graduation rates and higher levels of career and college readiness skills among our graduates. Our young people require this strong foundation in order to have options after high school – whether apprenticeship, certificate, community college, or four-year college.
- This is not an either electives and CTE or higher graduation requirements decision. Districts can and have figured this out though it will and does necessitate working, scheduling, staffing, and delivering instruction and curriculum differently.
- The Board's continued push toward aligning graduation requirements with college entrance requirements has helped move Washington toward a system where all students leave high school prepared for the next level. The numbers are dismal in Washington State for college preparation. Twenty-eight percent of Hispanic students, 35 percent of Native American students, 41 percent of African American students, 50 percent of Caucasian students, and 61 percent of Asian American students are taking the courses needed to make them eligible for a public four-year school. In community colleges, over half of the students must take remedial classes at a cost of over \$18 million to those families who can least afford it and over \$65 million to an already financially anemic community college system.
- In Washington, our economy is driven by technology and innovation; unfortunately our education system does not currently reflect this. The state is number one in the percentage of payroll going toward high technology jobs. Our economy is driven by a well-educated workforce. The problem is that this workforce is not our own children.

The majority of the comments urged passage of the “no-cost changes” to the graduation requirements. One commenter urged the Board to “fund the change and protect the changes by making it a part of basic education . . . we don’t need another unfunded mandate.” Another commenter stated that “the legislature should re-prioritize state spending to accommodate the fiscal impacts of these new requirements.”

In addition, while urging support of the rule, other comments were received that did not relate directly to the rule changes being proposed: opposing high stakes testing; supporting the need to increase counselors in middle and high school; asserting that the community college system is underfunded and needs strengthening; advocating for changes to the state’s English and math curriculums; and wishing more could be done in the career/voc-tech area.

Response

Support for adoption to the state’s high school graduation requirements is noted. The changes approved at the November 10, 2011 Board meeting will require students in the graduation class of 2016 (or 2018 with an extension as authorized in the WAC 180-51-067) to take 4 credits of English and three credits of social studies classes. The added credits bring Washington State more in line with other states’ high school graduation requirements. Prior to the adoption of the rule, forty-five states with high school graduation requirements required 4 credits of English; 39 required 3 credits of social studies. Washington State required only 3 credits of English and 2.5 credits of social studies for high school graduates.

The changes represent the first step in the implementation of a career and college ready graduation framework developed by the Board. Research indicates that students, regardless of whether they go onto college or enter the workforce after high school, need rigorous course work in core areas in order to be successful in our changing economy. According to the Georgetown Center on Education and the Workforce, 67% of future Washington jobs will require some education beyond high school. The changes to our state’s graduation requirements are intended to keep all options available to students after high school.

The Board acknowledges the comments received regarding matters outside the scope of this rulemaking. State assessment requirements are determined by the Legislature, and are not within the authority of the SBE. While SBE is supportive of the need for additional middle and high school counselors, SBE can only advocate for funding for additional counselors; funding for community colleges is not within the authority of the SBE. It is a school district’s responsibility to coordinate the curriculum for a required subject area consistent with the learning standards prescribed by the Superintendent of Public Instruction. In regards to career and technical education (CTE), the SBE made several policy changes that are intended to provide districts with greater flexibility, including allowing a “2 for 1” policy for Career and Technical Education equivalent classes. The allowance for cross crediting should be helpful to the existing offerings of these districts.

Comments related to the fiscal impact of the revisions are addressed in section 3.I.B.

B. Opposed to Any Changes to the State's High School Graduation Requirements

The Board received seventeen written comments opposing any changes to the state's high school graduation requirements. In addition, seven individuals spoke in opposition to the changes at the Board's November 9, 2011 meeting. In summary, individuals providing comment opposed the rule for the following reasons:

- Even though the proposed changes would not cost the State, it would cost the local districts money they don't have. The language of CORE 24 was that no new mandates would be implemented without funding. There is no funding for this.
- The proposed changes do nothing for many of the districts in our area because they already require 27 credits to graduate. The proposed changes will limit a district's flexibility to provide different career tracks for their students. Most of these districts have a near 100% graduation rate and don't need a mandated change from the State.
- An increase in social studies and English credits for many schools will require increased staff or restructuring what teachers teach and perhaps result in some teachers teaching classes for which they are not highly qualified. It also affects teaching space and could result in insufficient classrooms for these courses.
- The increase in English and social studies will increase the dropout rate at our school and make students less "career and college ready".
- The decrease in electives would mean less students getting CTE experience in high demand fields. CTE classes help students stay engaged at school leading to less withdrawals from high school.
- Reduces access to the arts
- The proposed changes will adversely impact the ability of students to access high quality CTE courses that meet the standards identified by OSPI and other electives that fit the student needs.
- The increase in English and social studies requirements will have a negative effect on the opportunities students will have to pursue a well rounded education through CTE courses.
- The opportunities are there for students to choose the classes they need to go to college. There is no reason to raise the standards again. If new requirements are added, more students will lose opportunities to explore what our society has to offer. You should put more significant expectations on the 6-8 grade students moving to high school.
- These changes will drastically affect a student's ability to attend a skills center or take CTE courses offered at their local high school. The viable alternatives to education and the needs of the current work force dictate more, not less, CTE credits which a skills center offers.
- Washington needs a profound change in the quality of education, not the quantity. The proposed additions to the curriculum will fail to address the real issues and demonstrate a failure to look at the big picture.
- We are creating a system which tracks all students on a 4-year degree course. This has many negative consequences including forcing students into classes which are difficult for them and frustrating; not allowing students to take courses which interest them and relate to their career goals in the trades; communicate to students that pursuing a trade

makes you lesser of a person; create a skills gap for workers need for trades; and increase the drop out rate.

- Universities already set standards for entrance requirements. Students intending to go to college already choose the classes you are mandating for everyone. In essence you are not changing the requirements for the college bound but for the non-college bound. This takes away the choice for these students to take advantage of the great programs we have in CTE, the arts and others.
- The proposed changes take us in the wrong direction and will increase our dropout rate as students are punished for their learning disabilities and forced into an educational track that goes against their career goals setting them up for more failure.
- Adding more requirements will reduce the opportunities for electives and add to a more mediocre high school experience for students who will not have the opportunity in high school to take courses in areas they show promise in.
- This is not about equality. Every child deserves a good education and to be treated equally, but standardizing education is not the answer to equality, nor is adding requirements to their already busy high school lives. What we need to do is ask our children what they want out of their lives and let them lead the way.
- Your new requirements are punishing students by forcing them to take classes that have almost nothing to do with their futures.
- The arts produce high achievers; this will kill many of those programs.
- The language of CORE 24 was that no new mandates would be implemented without funding. There is not funding for these proposals. Don't take pieces of it and push them forward under the pretense that it won't have a cost to schools, students, and teachers or the integrity of the whole proposal will not be unbalanced to the detriment of the arts, music, CTE, and the whole child. New graduation requirements will only work if fully funded as a full package and in addition to full and adequate funding for the new current requirements.
- The board is pushing a four year university graduation requirement for all students at time when cuts to higher education will make it harder than ever for students who are financially challenged to attain the dream of going to a four year university; both because of tuition increases and course availability. Students don't need four credits of English and three credits of social studies to get into a community or technical college from which they can transfer to a four year university if they so choose.
- Given the state of our economy and increasing budget cuts, public schools are making difficult choices at the expense of our children, who will experience fewer electives and enrichment programs as districts balance diminishing resources to meet federal and state edicts. Now is not the time to increase costs. This creates an unfunded mandate.
- Districts required to implement the increase in credits will incur costs to hire additional certificated staff and additional curriculum.
- Until districts have a better sense of how much local levy dollars are available, the proposed rule changes should not move forward.
- The changes reduce the flexibility needed by school districts to provide the curriculum necessary to insure a meaningful education for each child. Allow districts the opportunity to get students where they need to be for graduation.

- The Board should not implement the 24 credits as a whole and not piecemeal. Prioritizing of separate and individual components removes any motivation of the legislature to implement the remaining parts of the package.
- Change to the Washington State History requirement should be voluntary.

Response

Comments opposing the changes centered around issues related to increased costs of local school districts to fund the changes, the reduction in the availability of the number and types of elective and CTE courses available to students due to implementation of the changes, concern that the requirements were too focused on preparing students for college and not for entry to the workforce upon graduation, and concerns that the changes would negatively impact the high school drop out rate. One comment advocated for the change to Washington State History to be voluntary.

In regards to funding of the changes, OSPI's analysis concluded that an increase of 1 English credit and .5 credits of social studies, along with a 1.5 credit reduction in electives, could be implemented without fiscal cost within the current 20 credit framework. The state's formula for general apportionment funding would require no additional state dollars in order to address these changes, as districts would have sufficient lead time to make staffing adjustments and modify course offerings for the graduation class of 2016. The SBE understands and appreciates that this change, however, creates planning considerations and additional responsibilities which may not quantify to a state funding cost but are nonetheless important to acknowledge. This understanding led the Board to offer a two year extension for implementation of the increase in English and/or Social studies credits required under this rule. The SBE is not moving forward with any of the career and college ready graduation requirements changes determined by OSPI to have fiscal cost.

The SBE recognizes that some districts may need to offset the increase of 1 English elective and/or the addition of .5 credits of social studies through the reduction of electives. However, the number and types of electives, beyond that specifically required by the state, will continue to be entirely within the discretion of the school district. The SBE's research indicates that many districts require students to graduate with credits far in excess of the 20 currently required for graduation from a public high school and further require significant offerings of electives beyond the state minimum. Because most districts already have made the English and social studies credit changes stipulated in WAC 180-51-067, the addition of 1 English credit, .5 social studies credits, or in some cases both, will not reduce significantly the number of electives and will still allow for the offering of electives in those districts. The new credit requirements specified in WAC 180-51-067 are intended to bring Washington's credit requirements in English and social studies more in line with the other 46 states that have established graduation requirements for public high schools.

As noted above, the Board's intent in revising the state's graduation requirements is to ensure that all students are prepared for postsecondary education, gainful employment and citizenship. This intention pertains not only to students on a four-year college track but also to those students who will require education or training at a community or technical college, trade school, or

apprenticeship to prepare themselves for the credentials demanded by living-wage jobs.. The Board expects that the new requirements will result in more students graduating better prepared for the citizenship, employment, and education challenges they will face after high school.

The Board received many comments urging support for career and technical education (CTE) courses and expressing concern that the revisions would significantly reduce the availability of these courses from a school's curriculum offerings. The state graduation requirements will continue to require that every student receive a credit in occupational education, thereby reinforcing the importance of career and technical education (CTE) as part of a student's education. Currently, Washington is one of only 13 states that require all students to take occupational/career and technical education. This long-standing commitment reflects an acknowledgement that CTE is a way to help all students plan ahead, for two- or four-year college degrees, for industry certifications or for registered apprenticeship options. Many CTE courses, including some taught at skills centers, offer credit that meets the academic credits required for graduation. Some CTE courses earn dual credit, meaning students earn college credit as well as high school credit, tuition free. CTE Advanced Placement courses such as environmental science and computer design are available in some schools. Under the "2 for 1" policy provided for in WAC 180-51-067, students will have an opportunity to take more courses because they have already met multiple requirements. Additionally, the "2 for 1" policy may encourage more students to take CTE exploratory courses which may open up career possibilities for a student not previously considered. Many CTE courses — including those taught at skills centers — offer credit that meets the academic credits required for graduation.

In regards to Washington State History and Government, OSPI prescribes a semester-long course or its equivalent in Washington State History and Government, as specified in WAC 392-410-120. WAC 180-51-050 allows districts to award credit based on satisfactory demonstration by a student of clearly identified competencies established according to a process defined in written district policy, which may be the approach Tacoma has taken. The new noncredit Washington State History and Government requirement will enable students to satisfy the requirement at a middle or high school level, for credit or not for credit, depending upon the academic level of the course. Districts will continue to have flexibility to award competency-based credit. See also, the Board's FAQ *Social Studies Graduation Requirements Under WAC 180-51-067* at <http://www.sbe.wa.gov/documents/FAQ%20Social%20Studies.pdf>

Concerns regarding the effect on the availability of the number and types of elective course offerings provided by high schools due to these revisions is addressed in section 3.I.D.

C. Oppose Increasing English and Social Studies Credit Requirements, And Reducing the Number of Electives; Support for All Other Changes to The State's High School Graduation Requirements

The Board received twelve written comments opposing any increase in English or social studies credits and a reduction in the required electives from 5 ½ to 4 credits. In summary, individuals providing comment opposing an increase in the required number of credits for English and social studies and reducing electives commented as follows:

- Implementing the changes will begin the shift in “school culture” for many high schools to offer increased options and flexibility based on a student’s high school and beyond plan and result in a downward trend of CTE participation.
- Implementation of the changes will reduce and limit CTE opportunities for students. CTE courses provide students with the opportunity to learn meaningful, relevant, transferable skills that they can apply directly to any post-secondary options.
- Increasing graduation requirements would be a detriment to many students. One third attempt college, the others need the studies and experience CTE classes provide. Without enough elective slots available, students cannot get the course completions they need for school to work certification in available careers.
- These changes devalue the electives offered in our schools. These are the very classes that keep students attending school.
- If you eliminate electives, you eliminate choices and opportunities.
- The proposal’s changes reduce a student’s ability to construct a strong high school education. There are better ways to give students powerful and empowering options that build skills in English Language Arts and social studies without reducing choice and narrowing the curriculum.
- We need to increase the availability of elective courses and specifically CTE courses in order to provide options for students as they prepare to graduate and move on to post-secondary education and training. Enacting these changes will create major hurdles for students to enroll in elective courses due to the increase in basic education requirements.
- Concern about the “one size fits all” mentality that currently pervades the political side of education. Students have significant differences in ability, aptitudes, and learning styles. Effectively reducing student availability to electives, including CTE courses, denies many students access to the very resources that can aid them in becoming educated, productive citizens and skilled workers. More than ever, our communities and country need an educational system that respects diversity and leverages our differences to help create a stronger workforce and more engaged citizens.
- Instead of taking a student out of a subject in which they are passionately seeking a profession and put them in another English class why not have the CTE class weave the English topic within their class. If civics is the issue, why not require CTE classes to add it to their standards?
- Decreasing electives is the wrong direction. If you want productive citizens you should be talking about increasing occupational credits.

Comments supporting all other changes to graduation requirements were as follows:

- Implementing these changes potentially increase the flexibility that is needed for many students now and begin the shift in “school culture” for many high schools to offer increased options and flexibility based on a student’s high school and beyond plan.
- These proposed changes introduce flexibility into a student’s schedule without compromising rigor.
- The proposed changes speak to and support a high school student’s need to be in charge of their own education, while gently guiding them towards a strong preparation for adult life.

- These actions on your part will also be strong support for the entrepreneurial, innovative and creative energy in our youth, as they get involved with finding ways to hasten achievement of their graduation requirements and shorten the distance between school and money in their pockets, whether they choose college or a career path.

RESPONSE

See the Board's response in subsection 3.I.D. regarding comments received from the public regarding concern about the impact on availability of electives and choices for students, participation and course offerings for students, narrowing of the curriculum and concern that the changes are focused on preparing students for college and not career. Comments supporting the other changes to the state's high school graduation requirements are noted.

D. Opposed to Reducing the Number of Required Electives from 5 ½ to 4 Credits for Graduation from High School

The majority of the comments received by the Board were opposed to reducing the required number of electives from 5 ½ to 4 credits. This included 255 written comments sent to the Board and 3 verbal comments made at the public hearing on November 9. In summary, the comments opposing this change were as follows:

- To meet individual needs, students need more, not less flexibility in making class choices and electives should be the student's choice.
- Reducing the number of elective credits will make it more difficult for students to take 4 years of music or the arts in high school. This may require some students to take online courses to continue music education in high school.
- Music students out perform non music students on achievement tests in reading and math. Skills are developed that are valuable to students in mastering other subject areas such as math, reading and science.
- This is the time when students should have opportunities to explore what they might be interested in doing for a career through elective choices.
- Removing elective credits will not improve grades and test scores and instead will make students care less about school and education by taking away courses of interest
- Students need to learn things they are excited about learning and not be told what to learn. Keeping their elective opportunities alive keeps them interested and active in their own education.
- Electives motivate students to stay in school. Motivated students make better students.
- Elective credits should be increased and not decreased.
- Electives provide students with the opportunity to take courses that provide them with a well-rounded education and more attractive as a candidate for acceptance to a four year institution of higher education
- You will be short changing our brightest students. Test scores will go down and drop out rates will go up. Give students a change to learn subjects that engage their minds, talents and skills.
- Less students will enroll in the arts and you will be closing colleges because your in-state enrollment will have dropped considerably.

- Electives give students a chance to find out where their gifts lie; Decreasing electives would be going in the opposite direction.
- Electives are just as important as required courses. They keep kids in school, give them more life-path options, enrich their lives, and keep them in school.
- Doing this will have a detrimental effect on the arts programs in our high schools.
- Please don't diminish the importance of students who excel in subjects other than core curriculum
- The arts and music are essential to a balanced education. The arts foster the very creativity that industry seeks.
- Opportunities for electives are too narrow; electives enrich students as people and help them find their interests and passions
- Please allow a flourishing and rich slate of elective course offerings to remain at Washington State High Schools.
- Classes in music, art, dance, etc. directly impact how skills are developed in areas such as creative thinking, discernment, collaboration, problem-solving and abstract thought.
- Cut electives and you are cutting imagination. They are essential to the development of our children and vital in shaping the whole child.
- Cutting electives will cause struggling students to drop out of high school; it is the electives that keep struggling students in school.
- Reducing electives will force students to take classes for which they have no interest.
- Reducing electives will have a devastating impact on music programs in our high schools. These programs are vital to the education of our children and must not be put in jeopardy.

Response

The SBE recognizes the importance that electives play in providing students a well rounded education. Currently, many districts encourage students to explore their interests by requiring students to graduate with more electives than the minimum required by the state. In those districts, it is expected that the addition of 1 English credit, .5 social studies credits, or in some cases both, will not reduce significantly the number of electives and will still allow for the rich offering of electives that the public identified as valuable to a child's education. In addition, the state graduation requirements will continue to require that every student earn a credit in occupational education and a credit in arts, the two subjects most often cited to be of concern. This commitment will reinforce the importance of both of these areas as part of a student's education.

The SBE recognizes that some districts may need to offset the increase of 1 English elective and/or the addition of .5 credits of social studies through the reduction of electives. The SBE recognizes that districts will need to balance elective requirements with instruction in the core subject areas required under WAC 180-51-067, and that the responsibility for deciding how best to address individual student needs, including those who fail courses, rests at the local level. These changes to the state's graduation requirements are needed at this time to meet the SBE's goal of preparing all students for post-secondary education, gainful employment and citizenship consistent with the requirements set forth in RCW 28A.150.220. A key strategy to meet the Board's goal is to create a coherent and rigorous set of graduation requirements that keep all

options open for students after high school. The new credit requirements specified in WAC 180-51-067 are intended to accomplish this objective of making students career and college ready and put Washington State on par with the vast majority of other states in the nation that require 4 credits of English and 3 credits of Social Studies to graduate from high school. Reducing the number of electives by 1.5 credits maintains the total number of credits required for graduation at twenty and allows for reallocation of credits by school districts to meet the increased credit requirements in English and Social Studies.

The Board recognizes that not all students will attend a four-year university and that rigorous career and technical education programs are important programs for our state's high schools. Additionally, recent studies, though not undisputed, have shown that the skills needed to succeed in college are similar to skills needed for living-wage jobs.

E. Miscellaneous Comments

The Board received 25 miscellaneous written comments regarding the changes to the state's high school graduation requirements. These comments and the Board's response are set forth in Appendix A, *Miscellaneous Comments Regarding WAC 180-51-067*.

II. Comments from School Districts

The Board received written responses from 85 school districts providing feedback regarding the proposed changes to the state's high school graduation requirements. Four responses (Bi-County Superintendents (14), Panorama Superintendents (20), Spokane County Superintendents (14) and Whitman County Superintendents (13) were from multiple districts; two districts (Auburn, Northshore) sent more than one response. The comments received and the Board's responses are set forth in Appendix B, *Comments from Washington State School Districts Regarding WAC 180-51-067*.

Appendix A – Miscellaneous Comments Regarding WAC 180-51-067

	Comment	Response
1.	<p>Changing graduation requirements is a decision that you should carefully consider. If you are increasing the requirements and asking students to take more – I believe that is a good decision. Less is what people want. Students in Japan go to longer school days, take more intense classes and spend much more time learning than American counterparts. The net effect is that they outscore us on every diagnostic test known to mankind. We need to ask more of our students in order to compete in the world job market. High school is a place where students should be able to explore their interests and try out new things. Four years of a foreign language, a band, an orchestra or a choir, a building trades class, a business program, a med prep program have tremendous impact on a student and their preparation for the future. Please feel free to contact me as I have been an educator for 39 years and have seen the results of changes in graduation requirements first-hand. (Teacher Great Falls, Montana)</p>	<p>The changes to the state graduation requirements in WAC 180-51-067 represent the first step in the development of a career and college ready high school diploma. The Board does not intend to proceed with increasing credits above 20 until funding is provided by the legislature.</p>
2.	<p>Our school district (Walla Walla #140) currently teaches northwest history/government at the 9th grade. We have taught it at that grade level since 1982, my first year of teaching in the Walla Walla School District. We did so because the class was required by state law and was also a SBE high school graduation requirement. According to Katie Martin at OSPI the SBE is considering moving Washington State History to the middle school level but still making it a requirement for high school graduation. My concern is why have a middle school class required for high school graduation? Teaching it at the middle school level, given the textbooks produced on the subject are all written at a middle school reading level, seems appropriate. Requiring it for high school graduation is not. Make Washington State History a required course to teach in every middle school social studies curriculum and leave it at that. Discontinue it as a high school graduation requirement. The high schools will be able to offer other social studies classes and will not have to offer "take over" classes to those middle schoolers who failed the class. The high school will also not have to offer a section of Washington State History every other year to accommodate those students who transfer in from other school districts outside the state. I urge you to change the law and then change the graduation requirement. I support increasing the state social studies requirement to 3.0 credits. Many schools currently require 3.0 credits of social studies for graduation including Walla Walla High School. I have taught social studies for 30 years and would enjoy the opportunity to talk to you about this matter at anytime if you need more info.</p>	<p>The SBE elected to maintain the WA State History and Government requirement for graduation, but make it a noncredit requirement that could be satisfied in middle school or high school. Washington law (RCW 28A.230.090) does not permit districts to award credit for course work taken prior to 9th grade if the academic level of the course work does not exceed the requirements for 8th grade classes i.e., is not at a high school academic level. State Board of Education rule required students to earn .5 credits in Washington State History and Government. This policy conflict put districts in a bind because technically, many districts could not award credit due to the academic level of the class. The new policy will provide greater flexibility for districts and students. Districts can offer Washington State History and Government at a middle or high school level. If offered at a high school academic level, districts may still choose to award credit even if the course is taken in middle school.</p>

Appendix A – Miscellaneous Comments Regarding WAC 180-51-067

	Comment	Response
3.	<p>Most schools are already requiring what the State Board was proposing. Why not let schools have more flexibility with their offerings. I always hate to cut electives. We already have a hard time keeping kids interested in school. And what is our requirement for WA state history? Many large schools provide it in Middle School/Jr. High. Aren't our 9th graders taking that? I don't mind changing since we are so close anyway.</p>	<p>It is correct that most school districts in Washington State are requiring what the Board adopted in WAC 180-51-067 with regards to increasing the English and social studies credit requirements (84% of school districts currently require 3 credits of social studies; 82% of school districts currently require 4 credits of English). The state's interest in graduation requirements is to ensure that all students are prepared for post secondary education, gainful employment and citizenship. Districts have the flexibility to require additional electives, which many districts do, that exceed the state's minimum high school graduation requirements. As regards Washington State History and Government, please see the response to comment #3 above.</p>
4.	<p>The Washington State Board of Education is considering a goal of requiring 24 credits for graduation, when funding allows. This will impact a student's ability to participate in music, or any elective, consistently over their High School career. Please consider the damage it would cause our performing arts students before making this decision. Many districts uphold additional requirements, above the state required levels. This further limits flexibility and access to a Broad-Based Education, for all students. In many cases, students will not have the flexibility to stay in music for 4 years, causing a significant drop in enrollment, at the high school level. Studies prove over and over again that there are huge cognitive benefits in arts education (Michael Posner et al., "How Arts Training Influences Cognition" Learning, Arts and the Brain 2008), Elizabeth Spelke, "Effects of Music Instruction on Developing Cognitive Systems at the Foundations of Mathematics and Science") By making it more difficult for students to pursue studies in their elective areas, students will find themselves on a tightly prescribed schedule finding virtually impossible to take a sequential arts, or single elective area curriculum, continuously through high school. This does a great disservice to our young people. Thank you for your consideration.</p>	<p>While the Board has approved a 24-credit career and college ready diploma, the Board is not moving toward adopting the 24 credits into rule until funding is provided.</p>
5.	<p>Why would you make US Government a non credit course? It currently is a rigorous academic course with so much rich content that our students need to have to understand. They need the history of how our government evolved and how our Government works today. Our students need to value it, be informed be encouraged to be interested in politics. There is so much they learn in that</p>	<p>The SBE made Washington State History and Government, not U.S. History and Government, a non credit course. See Response to Comment 3 for an explanation as to why this decision was made by the Board.</p>

Appendix A – Miscellaneous Comments Regarding WAC 180-51-067

	Comment	Response
	class. I would hate to see it looked at as just another state requirement.	
6.	<p>The Washington State Board of Education has adopted an ultimate goal of requiring 24 credits for graduation when funding will allow that. While WMEA’s primary concern is for students to receive adequate opportunities in music education, a broader issue is that all students should have access to reasonable coursework in areas of personal interest and skill. Student-choice electives provide that for them, where prescribed curricula can prevent them from developing their own skills and talents to their highest levels. The above schedule effectively leaves 2.0 credits available for college-bound students to take four years of music if desired. Students interested in a career in the arts could obviously apply their career-concentration credits to music, but students whose career interests were in other areas will find themselves on a very prescribed schedule in order to take music continuously through high school. Note that most students who drop music as a continuous class do not return to those classes in high school, thus impacting their opportunities in music in college and later on in life. More than that, though, limiting elective choices for students can prevent them from having an effective broad-based education which includes expanded knowledge of areas of personal interest. Currently most districts offer the opportunity to take 24 credits of classes for graduation. If they do that and do not exceed the state graduation requirements in any area, then interested students can schedule music for all four years. However, if districts have requirements that exceed the state’s in any of the above areas, those additional requirements must be taken from the electives. The data in the two sections following this introduction are based on the 2010 State Board of Education report of graduation requirements district by district. When the state board’s list is ultimately implemented, most students will be forced to give up elective credits to fulfill districts’ additional requirements. Unless the state-prescribed electives are protected as being truly student-choice and not accessible to being usurped by the districts there will be several unintended consequences: 1) The entire elective choice process will no longer be available to many students because there will be no room in their schedules for individual needs to be met. Districts will be flooded with waiver applications. 2) This action will lead to the eventual elimination of electives around the state, with choices no longer available to many students. In the current economic climate,</p>	<p>While the Board has approved a 24-credit career and college ready diploma, the Board is not moving toward adopting the 24 credits into rule until funding is provided.</p>

Appendix A – Miscellaneous Comments Regarding WAC 180-51-067

	Comment	Response
	<p>most school districts are eliminating classes with small enrollments. When students can no longer access electives (such as music classes), enrollments will decline and districts will eliminate the courses. That will deny access for all students, even those who choose that subject as a career path. 3) This decline will be further exacerbated by remediation of students who fail HSPE and EOC exams. To meet their needs, students need more, not less, flexibility in making class choices. There are 295 school districts in the state, with 47 of those being non-high school districts. Of the remaining 248 districts, 87 of them are on non-traditional schedules that allow for more than 24 credits or are based on alternative crediting (those districts are listed at the end of this report). That leaves 161 high school districts that appear to be on a traditional 24-credit path over four years for students. The following 99 school districts (61.5% of the 161) on a traditional schedule have the additional graduation requirements listed below. (Listed all the districts with this criteria). The following 87 school districts currently require more than 24 credits for graduation or have unusual credit numbers and thus may be on a schedule that permits more than six credits per semester. Block scheduling (4 classes/day, 32 credits total), seven-period days (28 credits total) and trimester schedules (5 classes/day, 30 credits total) are typical variations that permit more credits. These districts may have additional requirements beyond the state's, but they also offer the students additional opportunities to earn credits and are therefore not included in the preceding statistics. It should be noted that the vast majority of these are smaller school districts with total student enrollment numbering 2,000 or fewer. (Listed districts with this criteria as well).</p>	
7.	<p>In a recent article in US News and World Report, major businesses in the US cited, creative problem solving and critical thinking skills as the most important skills they required of their future employees. The Arts teach these skills, yet they are on the chopping block again as the new, "Career and College Ready" program is proposing schedules, which drop the Arts. In May of 2011, The Presidents Council on Arts and the Humanities cautioned against dropping the Arts from curriculum. The committee headed by the first lady, Michelle Obama, stated, "At this moment in our nation's history, there is great urgency around major transformation in America's schools. Persistently high dropout rates (reaching 50% or more in some areas) are evidence that many schools are no longer able to engage and motivate their students. Students who do graduate</p>	<p>Beginning with the class of 2008, all students in Washington were required to earn one credit of visual and performing arts. Prior to 2008, other subjects could be substituted for the 1 credit arts requirement. In this way, the SBE has strengthened the arts requirement by mandating that all students must earn one credit of arts. WAC 180-51-067 does not alter this commitment.</p>

Appendix A – Miscellaneous Comments Regarding WAC 180-51-067

	Comment	Response
	<p>from high school are increasingly the products of narrowed curricula, lacking the creative and critical thinking skills needed for success in postsecondary education and the workforce. In such a climate, the outcomes associated with arts education — which include increased academic achievement, school engagement, and creative thinking — have become increasingly important. Decades of research show strong and consistent links between high-quality arts education and a wide range of impressive educational outcomes." Please take into consideration the true needs of our students and assure their future success by supporting the Arts in our schools.</p>	
8.	<p>I am writing to support Washington ACTE's position on the state's proposed changes to graduation requirements. Increasing graduation requirements for English and Social Studies will necessarily mean that students will have less opportunities to take elective classes. I am a retired CTE teacher and I have seen first hand the impact of CTE programs. CTE courses are specifically designed to prepare students with skills they will need to enter the workforce. These include reading, writing, and math skills. Many students learn best in these "hands on" classes and I know for a fact that reading, writing and mathematical skills develop more efficiently when they are part of a contextual learning environment. CTE programs are historically proficient at fostering student growth. I would even be so bold as to say that if you take a look at the test results for CTE students you would find them comparable or even higher than those who take traditional classes. The proposed changes in graduation requirements would likely mean that CTE programs will need to be cut back due to lack of funding. This would especially impact small districts. If you really want to increase English and Social Studies requirements please consider giving students dual credit when taking some CTE classes, especially when academic skills are intentionally incorporated into the class. This will ensure that Washington's students graduate from high school with the option to immediately enter the workforce or continue to college. There is so much more I could say but I acknowledge the need to be brief. Please consider carefully the consequences of the changes you propose.</p>	<p>Unlike many states, the SBE has a long tradition of requiring 1 credit of occupational education (CTE) for all students. Washington is notable in that it is in the minority of states that require all students to take 1 credit of occupational education.</p> <p>The SBE recognizes that some districts may need to offset the increase of 1 English credit and/or the addition of .5 credits of social studies through the reduction of electives including CTE courses. However, the number and types of electives, beyond that specifically required by the state, will continue to be entirely within the discretion of the school district. The SBE's research indicates that many districts require students to graduate with credits far in excess of the 20 currently required for graduation from a state high public high school and further require significant offerings of electives beyond the state minimum. It is expected that for the majority of districts, the addition of 1 English credit, .5 social studies credits, or in some cases both, will not reduce significantly the number of electives and will still allow for the offering of electives in the areas you identified.</p>
9.	<p>I am a teacher who really sees the benefits of CTE's electives in regards to student career choices and preparation for the world of work. Student's need to come prepared to work in today's economy, especially with the rising tuitions of a college degree. Many students will have to work to put themselves through</p>	<p>See response to comment 10.</p>

Appendix A – Miscellaneous Comments Regarding WAC 180-51-067

	Comment	Response
	<p>school or some other type of further training to get the job they desire. Many students will have to have adaptability and transferable skills in order to do that. These are the skills learned in a CTE course. Students need to have the options of taking several CTE courses to find interests, learn about various careers, and decide upon a career path will that will coincide with their aptitudes, personality and skills acquired in the high school years. With the increase in other classes, you are taking away students abilities to do so. I have been teaching for 30 years and have seen the difference a focus has for students and keeping them in school and on track. Student options should be our first priority with a well trained work force.</p>	
10.	<p>I am a CTE teacher in the Renton School District. I teach a computer technology course that is very relevant to today's job market. Probably 80 to 90% of my students who get an industry certification in my class are working at a living wage job of \$14-16 an hour right out of high school. I am having to teach 4 other classes this year because my numbers are so low my class doesn't generate enough funds for my salary. Part of the reason I can't get enough students is that my class is a 2hr. block. Many students can't take my class because they can't fit it into their schedules because they have too many required classes. We don't need more requirements to get in the way of career oriented classes.</p>	<p>As previously noted, the Board's requirement of one credit of occupational education for all students demonstrates its commitment to CTE courses as part of required instruction. A school district will continue to have control over a district's master schedule. WAC 180-51-067 is not intended to affect this arrangement.</p>
11.	<p>Before assigning new academic requirements for high school graduation, please consider the 40 to 50 percent of our students who are not planning on further academic education and are desperately needing guidance and training for a career. Further academic requirements will not result in added confidence for them to pursue a career and contribute to our society. Look around and look at the statistics -- we are certainly letting a high percentage of our population down by making them feel they are non-achievers just because they are not book learners. One more English class will not propel them to a higher level of achievement. The opposite will more than likely be the result.</p>	<p>Research indicates that 67% of future Washington jobs will require some education beyond high school. Therefore, a key strategy to meet the Board's goal of insuring students are prepared for post-secondary education, gainful employment, and citizenship is to create a coherent and rigorous set of graduation requirements that keeps all options open for students after high school, including certificate, apprenticeship leading to licensure, and/or degree opportunities.</p>
12.	<p>I am writing to comment on the proposed changes to graduation requirements. I am a teacher in a state Skills Center and the beneficiary of CTE training during my own education in Washington State. The proposed increases in English and history will significantly hinder a students' opportunity to take CTE courses and potentially make Skills Centers impossible to attend. I have no problem with keeping the skills learned by high school students current, rigorous and relevant but I ask you to consider the benefits provided by CTE: 1) We agree that a</p>	<p>The Board is supportive of students who want to pursue training in apprenticeship and certificate programs and benefit from the offerings of a skills center. Your comment that a majority of jobs will require some training beyond high school is noted. It is projected that this education will occur at a four year college or university, and at community and technical colleges. Research indicates that rigorous instruction in core subjects</p>

Appendix A – Miscellaneous Comments Regarding WAC 180-51-067

	Comment	Response
	<p>majority of jobs in the future will require training beyond high school. However this training is not limited to academic college programs. A huge number of jobs will require training in apprenticeship and certificate programs. CTE courses directly relate to these trainings. 2) A majority of our students will not receive a 4 year college degree. Statistics have repeatedly shown this. These students are owed quality options leading to living wage jobs and productive futures. For many students this comes from CTE. 3) For many students CTE courses are a "last resort". They have not been served by their academic experience. Many of my Skills Center students have told me that they came to our school before giving up and dropping out. Many more than I can count have found relevant education here that has led to a rekindled belief in themselves and their belief in learning. These students have normally continued on to apprenticeship, or to two and four year colleges. Those who have not have left high school with a skills set allowing them to enter industry. I hope you will consider the benefits of CTE and the effect or "unintended consequences" the proposed changes will have on a vital educational resource.</p>	<p>while in high school is critical to a students' success in mastering such knowledge areas at post secondary institutions. The changes to the state's graduation requirements reflect this reality. Moreover, they keep all options available to a student upon graduation from high school. The Board received many comments expressing the value of CTE courses in keeping students engaged and interested in school.</p>
13.	<p>I wanted to express my support for the ACTE's position on the "Career and College Ready proposal. As a world language teacher I am very concerned that students will not be able to take foreign language and music or art. You also need to remember that colleges require students to take at least 2 years of a foreign language in order to be accepted as freshman. Raising the credit requirement also causes many staffing and scheduling problems.</p>	<p>See response to Comment 4.</p>
14.	<p>We support the ACTE's position: The see the "zero cost" pieces of the full "career and college ready" graduation proposal affecting our students and their opportunity to access high-quality world language programs, CTE programs and other electives.</p>	<p>Your comment is noted.</p>
15.	<p>As a member of WA-ACTE, I was notified of the proposed rule changes concerning graduation requirements. I wish to submit the following comments. First, I am concerned that the Board doesn't want to listen to the very people on the ground who must carry out these rules. We are busy teaching and working with students during the school year and do not have time to carefully read, research, evaluate and engage in this process. My union or district never told me about any hearing or discussion. Second, have you asked students about how they learn? More and more, students tell me that there are not enough "hands on" learning opportunities. You are proposing to increase the academic</p>	<p>The Board appreciates the importance of listening to practitioners tasked with implementing state policies, and extended numerous opportunities to invite public comment on its proposed actions. A key strategy to meet the Board's goal of insuring students are prepared for post-secondary education, gainful employment, and citizenship is to create a coherent and rigorous set of graduation requirements that keeps all options open for students after high school, including certificate, apprenticeship leading to licensure, and/or degree opportunities.</p>

Appendix A – Miscellaneous Comments Regarding WAC 180-51-067

Comment	Response
<p>requirements at the cost of eliminating learning opportunities that combine mind and body. When did you go to school? I invite you to be a student for a week to see if you can stay engaged for 5 to 7 periods a day in the framework of your proposed rules. Third, have you asked the families? In the schools, I see young people move from school to school – district to district. Increasing requirements without some form of flexibility can be devastating to a student who is trying to complete their requirements. In these economic times, this group is expanding. In 2010, I worked for a three month period for the College Success Foundation, visiting school districts and schools in ESD 189 for the College Bound program. I talked with staff, community members, students and parents about their educational process. I saw many schools offering good college preparatory programs supported by AVID, Navigation 101 advisories, Upward Bound, Y-Programs and many others. These communities of cultural and economic diversity face many challenges. I ask that you consider the consequences of your decision making. I draw upon my experience as a Career and College Specialist and CTE teacher. Living within a school environment for many years, my insight to these proposals goes as follows: 1. Increase English from 3 to 4 credits: I don't know that this is suited for ALL students. Language Arts can be incorporated in many forms of study besides adding an additional year of curriculum. When helping students with their college applications, essays, etc., I was shocked to learn that they do not know how to address an envelope or find a post office to affix proper postage. Even though many applications are online, the transcripts, letters of recommendation and other materials are still sent through the mail. I've seen many students who put a first class stamp on a large envelope, thinking it would be delivered, only to have the envelope returned to them (if the Post Office could read the return address) and miss the deadline date. I asked my Language Arts teachers if they covered this in their classes. No, was the answer. Wouldn't a business class serve to actively teach how to write a cover letter, compile a resume and familiarize students with the up-to-date office products from Microsoft, Apple and Google? What about a walk-through of online applications for college, scholarships, and jobs? How about learning to do a budget for college, work or living? How about some understanding of the importance of reading contracts before you sign? (What a great class discussion!) What about banking? What about student loans? Where are your requirements for this type of literacy? Very few students are able to articulate an</p>	<p>The Board respects that decisions about the placement of courses within the curriculum, and the manner in which those courses are delivered, are made by the local districts.</p>

Appendix A – Miscellaneous Comments Regarding WAC 180-51-067

Comment	Response
<p>understanding of how the everyday world works. 2. Increase social studies from 2.5 to 3 credits; require .5 credit of civics per RCW 28A.230.093 I am definite in favor of this one! BUT, I see it more as a CTE class than a dry old classroom curriculum. How can you ask a student to study community and government, relationships without a form of involvement and hands-on learning? I worked with students in 2003 who were passionate about the threat of war. They researched to write letters, visited their elected representatives, organized school wide assemblies and demonstrated. Along the way, they learned that their involvement was valued and appreciated. Most of the group went on to college to continue their involvement with community. I am honored to receive updates through email. In Senior project presentations, I heard time and again how meaningful the active involvement with a community organization or group was. This experience changed their lives and self esteem. Students of all learning abilities seemed to learn and thrive through these hands-on experiences. I think the word is meaningful. Last year, I arranged for students I know from the Outdoor Education POST and Junior Statesmen of America to serve on a panel for the Guiding Lights Conference at the Seattle Center. The theme of this conference was “civics”. These students talked about their community involvement. More students facilitated discussion at round tables throughout the hall. It was an exciting and enlivening afternoon. 3. Decrease electives from 5.5 to 4 credits. How about making the above 1.5 credits more flexible by opening up these two subjects into choices between academic study and the experiential? That way the student would have a choice to fit their learning style and still fulfill this requirement. 4. Make successful completion of Washington State History and Government a noncredit requirement. This seems to work as long as there is a way for the student to complete this if they were not in the state prior to high school. How does this work without some cost to the school? 5. Clarify that 2 credits of health and fitness are .5 credits health and 1.5 credits fitness. I like what I’ve seen the Physical Education departments do with their program and I believe this is a good way to define it. As I understand it, the PE teachers like it. 6. Enable a “two for one” policy that would allow students to earn one credit from taking a Career & Technical Education (CTE) equivalent course while satisfying two graduation requirements. I like this. It gives flexibility and would actually cover my suggestion above, allowing students to choose an English class that is geared to apply to real life needs and the Civics class that</p>	

Appendix A – Miscellaneous Comments Regarding WAC 180-51-067

	Comment	Response
	<p>can offer student a deeper appreciation and understanding of their community. One thing I am not certain of is that the CTE organizations have worked hard to document how the classes incorporate the teaching of English, Social Studies, Math and Science in their curriculum and this does not seem to be reflected in your rules. Am I missing something? 7. Substitute a non-time-based definition of a credit for the time based 150 instructional hours. Having worked in three “alternative” schools that need a more adaptive learning environment for their students, this makes all the sense in the world. The bottom line in the learning process is all about the relationships we build with students. With some of these changes, you are making it possible to allow teachers time and space to engage their students. I wish to commend the person who compiled the Draft Revisions to SBE Graduation Requirements and Credit Definition Rules for their analysis and organization of this document. It was most helpful. I don’t see how these changes will not affect the budgets of all school districts. Thank you for the opportunity to comment. Ever onward!</p>	
16.	<p>As a parent, school district employee and concerned community member, I have been horrified to see the "Dummying down" so we could get kids through school We keep changing testing and simplifying so everyone can graduate. WE, you, me and the other guy need to see it how it is. It’s really sad to hear the kids riding my school bus talk about the "STUPID" teachers (who I know personally and know they really are great teachers) as these students don't know basic geography, math or civics. When they chat (loudly) about their grades, D's and F's, and again it's the teachers fault I really have to count to 10. We provide Headstart, Ecap and Preschool for "needy" students, yet when we follow these kids through the years how many are successful in graduating, or even still in school in our district or else where. We have such a high rate of ESL students in my district it saddens me to see we go above and beyond to assist these kids but hear(personally) and see the lack of support from the parents who demand more and more but don't take any of the responsibility on raising their children. When families are already low income, keep popping out babies, and we, bus drivers, teachers, para's follow these kids through their young lives to see there is no way these kids can succeed, to break the sad cycle, we are heart broken. Let’s not talk about budgets and funding. Let’s get back to basic education. Reading, writing and arithmetic. Foreign language in high school, advanced classes for those who qualify. No more "horticulture" or remedial for students who's</p>	<p>Your comments are noted. A key strategy to meet the Board’s goal of insuring students are prepared for post-secondary education, gainful employment, and citizenship is to create a coherent and rigorous set of graduation requirements that keeps all options open for students after high school, including certificate, apprenticeship leading to licensure, and/or degree opportunities. The Board respects districts’ efforts to involve families in the education of their children.</p>

Appendix A – Miscellaneous Comments Regarding WAC 180-51-067

Comment	Response
<p>parents didn't care in elementary thus by the time they are in middle school they are "THUG's", out of control and need "A SPECIALIZED SCHOOL FOR BEHAVIOR" or pregnant and WE (tax payers and the schools) pick up the pieces providing extensive \$\$\$ to pay for programs that may or may not succeed. Do you know how many bus drivers provide shoes, coats, lunch money, field trip money to kids they drive? Or the coaches who pay for "physicals" so they can try and keep the at risk kid in school by providing sports. We won't even chat about what teachers, bus drivers and parents provide so the kids in their class feel they belong, (having lots of spare markers, pencils, paper, you know, the basic stuff). In the past I have provided clothes, complete school list of needs to many students to keep them in school. (And I send the same to Indian Reservations so they have the basics) What is the solution? I really don't know but feeding the cycle is not the answer. Come ride some of the buses and experience the lives of some of these kids. One has to want to help themselves before we should provide (I am speaking of older kids now). It's not fair to blame teachers and principles for schools not making the grade. Expectations have got to be supported by the parents before a child is going to be accepting of education and social boundaries. (beyond welfare and other support we are currently providing way too many of our families) My kids are grown, fairly successful. I now have a grand child and I want schools to be great for her. I have high expectations. But it all starts with the basics. Call me sometime. I am not alone in these beliefs. We can chat about expectations, and heck, I'll share how we are replacing windows daily at one school because the "children" get upset and break them, or punch the walls out. or call the teachers, para's bus drivers "F'in B..." or worse, chat about the crude language and behavior that is accepted because they have "issues". These are learned behaviors, not a disability. I know about tourettes, I know about disorders, and I have enough back ground to know you lay out the expectations and follow through. And I know we don't do any of the above to halt any of it. Again, call me. I am truly a caring person, have worked in the behavioral area, know it can work. Believe it can work.</p>	

Appendix A – Miscellaneous Comments Regarding WAC 180-51-067

	Comment	Response
17.	<p>On behalf of the Immigrant and Refugee Coalition of 98118, I want to thank you for providing information on the proposed graduation requirements for our students. We know that the intention of the Washington State School Board Members is to make sure that Washington students will be as competitive with other students in the country. We think that allowing CTE classes to be included in the credits toward graduation is innovative and we support the idea. As you know, there are no less than 64 different languages in addition to English, being spoken by the residents in the Zip Code 98118. Naturally, we are concerned that the State Board has not considered the needs of the immigrant and refugee communities in terms of: a) Educating parents on how to be engaged in the workings of the school district and support their children. Parent accessibility is an important aspect to student success; b) Providing funding to Community Based Organizations for after school programs to address the more stringent graduation requirements, particularly the increased credit requirements for English; c) Providing foreign language credit for the language that our immigrant and refugee students already speak; Without addressing these concerns, we fear our students will not be able to compete fairly.</p>	<p>Your support for including CTE classes in the required graduation credits is noted.</p>
18.	<p>We're writing you as concerned students and future voting citizens of the state of WA. We attend the Vancouver School of Arts and Academics. To us, arts and arts education are everything. By having the opportunity to study 6 art forms (visual art, literary art, moving image arts, music, theatre, and dance) in depth, we're able to explore our passions. The experience, perspective, and life skills we gain through studying arts is irreplaceable and extremely valuable. In the theatre department at VSAA, we present 3 performances per year. Our fall show opens November 10. It's an original, site-based production titled Thresholds. Our director and team of writers began working on the show in August of this year. Throughout the process, we have been collaborating with Sojourn Theatre, a professional site-based theatre ensemble from Portland, OR. The setting is VSAA, and expressed is the struggle of being at an art's driven school in a world where art is threatened and art careers aren't valued. We explore several perspectives in the play; the perspective of many different art school students, their parents (both with artists' careers and without), art and academic teachers, administrators, prospective students, alumni, and the community. The entire cast and crew of Thresholds has worked for months on the production, with one common goal in mind. We want to express what art means to us and to our</p>	<p>Your expression of the value of art as part of the high school curriculum is noted. See Response to Comment 9.</p>

Appendix A – Miscellaneous Comments Regarding WAC 180-51-067

	Comment	Response
	<p>future world. Though we are an arts magnet, our focus on academics is emphasized and demonstrated through our exemplary test scores and 100% graduation rate. As you know, this is unprecedented in public schools today. Arts keep our students excited to go to school, thereby leading them to work hard and graduate. At VSAA, we also work to infuse arts with academics, which challenges students to view their academics in a more thoughtful, creative way. Not only does art support academic learning, but we very simply love it. As our character Kati Wolf says in Thresholds, "Art gives us passion, a reason to live, to breathe, to create! The great William Shakespeare said, "We are such stuff as dreams are made on." Art puts beauty into the world, and without beauty, what is anything worth?" Without the arts requirements we have now, our school and each of our lives would not be the same. We ask you to please keep in mind the future of students like us when you make any legislative decisions.</p>	
19.	<p>As a student attending Vancouver School of Arts and Academics (VSAA), I'm extremely lucky to have such amazing opportunities at my school. While at an arts based school I have not only gained so much information about dance as an art form, but also my love for dance has increased immensely. There aren't enough words to describe the impression that dance has left on my life. I applied to VSAA wanting to improve my technique and knowledge of the art form dance, but I got so much more. There were many memorable guest artists who I have had the chance to take classes from. Last year I participated in an audition with The Joffrey Ballet School (NYC) that was held at VSAA. Without having a class at school for dance I would never had had this opportunity. I benefited incredibly from the audition just by using it as a practice for other auditions I may encounter in my life. Having a dance class gives me an escape from the other stressful parts of my day at school. Instead of constantly worrying about homework and tests, dance is someplace that I look forward to going. Even when we do have tests in dance, it's not something I stress over. They are chances to show my improvement and practice performing. I look forward to dance because it's a class where I don't have to be stuck in a chair taking notes. I'm allowed to move and get out all of my energy. I wouldn't be who I am today if I didn't have the extra dance opportunities that I do. It has brought me a new way of learning. I love having dance at school and I wouldn't want it any other way. Please consider students like me who enjoy arts classes when increasing graduation requirements that would alter my ability to be in them.</p>	<p>Your expression of the value of art as part of the high school curriculum is noted. See Response to Comment 9.</p>

Appendix A – Miscellaneous Comments Regarding WAC 180-51-067

	Comment	Response
20.	<p>I'm a sophomore at the Vancouver School of Arts and Academics. I have been at this school since the 6th grade and I have treasured every year here. I'm blessed to have three more still to go. I came to the Arts School knowing that I wanted to write. I was inspired to keep up this passion as I grew in this environment. As a young writer, the arts are very important to me because now I can see a career for myself in reading and writing. Through literary arts, I have expanded my understanding of literature and poetry, which helps me to do my best in English class and makes me more focused in general. When I'm surrounded by the people who have the same love of writing as me, I'm encouraged to keep moving forward as both an artist and a person. Writing is my life. I can't imagine who I would be without it. I can see many other artists around me who would not be the amazing people they are today without the arts. All forms of art are important - dance, theater, film, writing, visual arts, and music - and the creativity that springs from them inspires students to work harder. Also, communities are often formed in the arts programs. I have formed lifelong friendships in writing and the camaraderie I experience with these friends is something to be treasured. When I begin to look for colleges, I will look for one that will support me as a writer with ambitions for the real world; I want to succeed and I know that if I keep focused on my goals, I will reach higher than I ever could have without the arts. Thanks for reading this letter. I hope that you take these points into consideration and decide to keep more arts credits for future graduating classes - it will really help my generation.</p>	<p>Your expression of the value of art as part of the high school curriculum is noted. See Response to Comment 9.</p>
21.	<p>These are hard times. These are times when things normally inaccessible are drawn up and laid out on the chopping block in an effort to make ends meet. I know that, and I've written you today knowing that. Still, I cannot in good conscience stand idly by and watch a disaster in the making. Arts education shouldn't be on that chopping block. It shouldn't be up for discussion or debate. It's fundamental, and I believe should remain a cornerstone of high school education. Reducing minimum arts grad requirements isn't damaging on its face, on the contrary, it's cost-effective. But consider this, what about those students whose sole pursuit is the arts? Don't the future Warhols of the world have the same right to their education as those future Paulings? What's the difference? How can you mandate one sort of education and cut down another? I freely admit that this is something I don't understand, nor do I believe it to be helpful in the long run. Let us revisit for a moment, the students and their right to</p>	<p>Your expression of the value of art as part of the high school curriculum is noted. See Response to Comment 9.</p>

Appendix A – Miscellaneous Comments Regarding WAC 180-51-067

	Comment	Response
	<p>education. It's your job as the WA State School Board to do right by those students, to offer them the best their state can offer them. They have a right not to be pigeon-holed, but encouraged to step outside the box. Schools are brimming with bright pupils, high-scorers who are completely and utterly flat. What truly gives a student an edge in these changing, competitive times is the ability to work in three dimensions. You do future generations no service by condemning them to facts and figures. The future is in the ability to work in new ways, not recite the past. Arts education has been shown to improve brain function, harnessing both right and left brain. This is what makes students competitive, their genuine ability to think in different ways. The future requires renaissance men, wherein artists aren't only craftsmen but scientists in their own right, and where thinkers aren't just machinists but creators as well. By forcing students to take arts classes you force them to learn how to think differently, with a more encompassing logic that pushes past point-A-to-point-B logic. It's the same as teaching a child to think mathematically, or scientifically, it is teaching a student to take a perspective and solve a problem in the same way. Now, remember who pays for public education. It's not the students. They have no say, no vote, no voice. They are reliant on you to act in their best interests, to make them competitive and to teach them all that they need to know. You can't punish an entire demographic for something over which they have no control. Please, we know that times are hard, and that things have to change, but not this way. As a student, I beg of you, don't sacrifice art in the name of budget. Don't inflict a fate upon a demographic without a voice to protest. These are hard times, I know, new and changing times, and the only thing concrete is the bottom line, but please don't let that bottom line cloud your vision. Arts education is as important as ever. Now isn't the time to cut it out.</p>	
22.	<p>I'm a senior at the Vancouver School of Arts and Academics, and I'm a concerned student. The arts have been a powerful outlet for me throughout my life. In my middle school years, if I didn't find art and discover my future in them, then I would be uncertain today of what to do; I would lack the passion I need to get through my goals and the ability to cope with life's stressors; I know that I'm not alone in this, and that cutting the art requirement from 5 to a mere 2 credits for all highschoolers in WA disturbs me. For someone unable to go to an art school, how do you expect an artist to feel in an environment that doesn't support the arts that they so dearly love? Who doesn't have their dance or music</p>	<p>Your expression of the value of art as part of the high school curriculum is noted. See Response to Comment 9.</p>

Appendix A – Miscellaneous Comments Regarding WAC 180-51-067

	Comment	Response
	<p>class? Who could have been a brilliant painter but have no paint available? When you're an artist, it consumes you, changing your senses; you hear rhythms in everyday life, beauty in the way someone pronounces words and carefully look at the way light casts a shadow. Without art, part of you is gone. This could repress the students of WA, crush their aspirations and limit the improvement of their skill. Yes-if the student truly wanted to have involvement with the arts, they could take a class outside of school, however those can be expensive, demand extra time and require parental support; some parents don't see the purpose of art and think of it as a waste, unable to even view it as recreational, like football or any other sport is often deemed as. As the WA SBE, I urge you to take care of your artists and your students. Even for those who don't want to pursue art, it's still a way to relax for them and practice another skill; a comfortable place to stop and change your focus, breathe. Such a drastic drop of credits will have ill affect on students, therefore must not occur at all costs. "Art is the only way to run away without leaving home." If what Twyla Tharp said once is true, what happens to those who don't have the means to escape every once in a while?</p>	
23.	<p>I'm writing to you as a junior from the Vancouver School of Arts and Academics urging you to support the arts in WA high schools. As a student at a WA arts magnet school, I acknowledge art as an important aspect of education. I invite you to maintain students' artistic endeavors and keep the arts elective credits from being reduced. It's important to remember that high school is for preparing students for the future. For some, high school is preparation for college and for others it gives experience to begin a career in the workforce. The purpose of college is to focus education and gain experience that most employers look for in employees. And the purpose of the rest of life is to have a purpose. In the end, it's all about having a purpose; a purpose in society and being a part of something. Art makes students feel like they have a purpose and a place at school. When high schools host a variety of arts courses, students are able to find their niche and express themselves. Art allows students to create an identity around school, beginning to call themselves 'artists' and looking forward to school. You may be able to relate to the hope, as a parent, that your children will involve themselves in school rather than feel unconnected to it. Art is education with a creative drive. In my experience, art has given students a class where they can experience creating. Art is feeling empowered to craft something that has meaning to the artist and feels purposeful. Art provides a creative lens through</p>	<p>Your expression of the value of art as part of the high school curriculum is noted. See Response to Comment 9.</p>

Appendix A – Miscellaneous Comments Regarding WAC 180-51-067

	Comment	Response
	<p>which students can better understand concepts presented in classes like English, Math, Social Studies and Science. Being satisfied in one's own artistic creations and, in result, discovering a sense of self will be helpful for future applications. I have found that literary art is my preferred form of artistic expression. Literary art is creative writing, an art elective offered at my high school. In the years that I've been writing I have developed an interest in journalism and communication. The literary arts have helped me to discover my personal interests. Most importantly, though, the arts electives at my school have given me confidence in my work and a reason to call myself an artist.</p>	
24.	<p>Man will begin to recover the moment he takes art as seriously as physics, chemistry, or money. -Ernest Levy. As a student in the Vancouver SD, as well as a student with ADHD, there's nothing more powerful to me than art. We know, without much doubt, that art can affect people. We also know that we can affect art. But what you all here may not know is how important art is, no matter whom or what it's affecting. As a child I can imagine many of you dabbled in art either literally by being your own Picasso with finger paints or maybe not in such a messy way. But at some point the human brain needs that creative release in order to grow. But we're not here today to talk about finger paints or crayons; we are here to discuss why we desperately need to keep art in our schools at a high school level. Allow me to share a story, not my own but someone who we all know, Albert Einstein. Did you know that he didn't originally want to be a scientist? No, Einstein was more interested in sports, and though he wasn't very good at them, found a way to be involved. It wasn't until later that Einstein discovered he had a knack for science. He discovered it, in fact, around the time he was 16. The same time when he would have been entering high school. How did he discover it? Because it was shown to him, he was given the opportunity. Sometimes we can't see our potential without someone giving us the opportunity. So who are we to take an opportunity away? By lowering the amount of credits of art needed to graduate we are doing just that, taking away an opportunity. But, if we continue to require the same amount as we have in the past or more, students are exposed to art and given a chance. Will all students take it? No, of course not, but some will. And who's to say that those people won't change the world. Because somewhere in our souls we all have an underlying desire to create, to make something and be able to say, "Look, this is mine, I made this," if you take away art in schools, you take away that power. You take away that</p>	<p>Your expression of the value of art as part of the high school curriculum is noted. See Response to Comment 9.</p>

Appendix A – Miscellaneous Comments Regarding WAC 180-51-067

	Comment	Response
	<p>power, and people will fall. So unless you want a ton of depressed students on your hands, I ask of you to keep art in school, or face a lawsuit. Your choice.</p>	
25.	<p>I'm writing to you today to address my concern in the matter of arts education. I've gone to VSAA since the 6th grade, so I know very well the affect that art has on a student. The impact art has made on my life will be there to support me far past high school. Believe me; I didn't always get it at first. I didn't know what it was I wanted to do. But by the 8th grade, I had found both vocal music and writing. These two art forms are now my passion. Both allow me to express myself, a luxury most students at a traditional high school don't experience. Through my art I have grown as a person, as a man, and as a human being. When in the process of creating new art, you don't have to be afraid to push yourself or to try new things. In fact at my school you are constantly encouraged to. Creativity is the word. I cannot tell you what it means for a student after he has created something he can truly be proud of, bringing to life something from his thoughts, making it reality. The benefit of creating art is a lifelong lesson. But we don't just create art, we apply this same level of creativity to our academics. Resulting in higher test scores than most schools, and ultimately with students who are happier to be at school everyday. No wonder we have a 100% graduation rate. Project based learning you might call it. The method works very well, and has personally always kept me more engaged to the material I learn. The arts are an important asset to the learning of a student. We as a school get to be around it everyday, but I cannot imagine what it must be like for students at a traditional school. They wouldn't even get a chance to see what it's like to express themselves through art. I understand money is tight right now, but that's no excuse when it comes to the knowledge of our future students. I don't think I need to tell you how important education is to the future of the nation as a whole. The kids today will be thinkers of tomorrow, and I know that I would feel more secure if I knew that they all got a chance to experience art. The affect it has had in my own life has shown me more than I have ever realized. My wish is for everyone to have a chance at having these kinds of art experiences. So just think today, about the future of tomorrow. Wouldn't you miss art?</p>	<p>Your expression of the value of art as part of the high school curriculum is noted. See Response to Comment 9.</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
9/21/11	Issaquah	<p>(1) The Issaquah School District already requires 4 credits of English and 3 credits of Social studies. (2) More discussion is needed about how, when, and where to meet the civics requirement. Specificity around the exact aspects of civics needed to be covered would help districts determine the best means of meeting this requirement. (3) It seems inevitable that electives will decrease as core requirements receive greater emphasis. However, there is a need to be open to equivalency and cross credit options for students to pursue interests while meeting core requirements if a district can provide evidence that those requirements are met in an existing elective course. (4) Making the successful completion of Washington State history and government a noncredit requirement is not an issue for the District. The District’s current practice is to provide that the 2 credits of health and fitness include .5 credit of health and 1.5 credits of fitness. (5) The District currently provides for CTE equivalency.</p>	<p>(1) Your comment that Issaquah currently provides 4 credits of English and 3 credits of Social studies is noted. (2) RCW 28A.230.093 requires that the content of the civics requirement must include, but not be limited to: federal, state, and local government organization and procedures; rights and responsibilities of citizens addressed in the Washington State and United States Constitutions; current issues addressed at each level of government; and electoral issues, including elections, ballot measures, initiatives and referenda. See also, the Board’s FAQ <i>Social Studies Graduation Requirements Under WAC 180-51-067</i> at http://www.sbe.wa.gov/documents/FAQ%20Social%20Studies.pdf. (3) The elective requirements established by a school district, above the minimum amount established by the SBE in WAC 180-51-067, will continue to be at the discretion of the local school district. Districts like Issaquah that are currently requiring 4 English and 3 Social studies credit requirements will not have to reduce the number of elective credits to provide for an increase in any core subject areas in response to the rule. However, the Board recognizes that this may not be the case for Districts needing to add additional credits to satisfy the increase in credit requirements for English and/or Social studies. The SBE has been supportive of equivalency and cross credit options. See WAC 180-51-050 providing a student with the opportunity for students to obtain credit based on competency for a particular course and RCW 28A.230.097 which allows districts to establish CTE equivalent courses. (4) Your comments that making the successful completion of Washington State history and government a noncredit requirement is not an issue for the District and that the District’s health and fitness credits are currently consistent with the requirements in WAC 180-51-067 are noted. (5) Your comment that the District currently provides CTE equivalency is noted. While school districts have long established CTE course equivalencies, WAC 180-</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
			51-067(7) will enable students to satisfy two graduation requirements while earning one credit.
10/06/11	Columbia (Hunters)	(1) Columbia already requires 4 years of English. (2) The District is currently doing the health and physical education requirements as proposed by the SBE. (3) WAC 180-51-067 would only require us to add .5 in civics. The District currently requires .5 credits for Pacific Northwest History. The non-credit option would potentially give us more flexibility. We think we can support this. At most it would require us to drop a .5 elective, but requiring civics is a good thing in our opinion.	(1) Your comment indicating that Columbia (Hunters) School District currently requires 4 credits of English is noted. (2) Your comment that the District is currently providing health and physical education requirements as provided in WAC 180-51-067 is noted. (3) Your comment that the district would only need to add .5 credits of civics which would at most require the elimination of a .5 elective credit is noted along with your support for the addition of the civics credit. The expectation that the non-credit option would provide the district with more flexibility was the Board’s intent in making this change to the state’s graduation requirements.
10/07/11	Northshore (Superintendent)	(1) Northshore School District presently requires 3 credits of Social studies but only 3 credits of English. Well over 80% of graduates earn 4 credits of English. One of three comprehensive high schools requires 4 credits of English. So while there will be some staffing impact which will require the district to offer more English sections and fewer sections of something else (likely electives), our system should be large enough to absorb the change. More broadly, concern about adding requirement that is offset with reduction in elective requirements and calling that “cost neutral”. It may be cost neutral in one sense but there is a cost in reduced elective opportunities for students in areas such as art, music, world language, CTE, health/fitness, etc. Teachers who find themselves with fewer sections to teach, and students who are motivated and inspired by those subjects and unable to access classes may find it hard to accept as “cost neutral” changes. The SBE needs to seriously consider the consequences for any and all elective courses by such a “cost neutral” approach to increasing academic requirements. The District supports increased academic requirements but not entirely through reduction of elective requirements. Unless SBE is willing to decimate elective programs, it will cost more money at some point to increase academic requirements and	(1) Your comment indicating that the Northshore School District currently requires 3 credits of Social studies but will need to add 1 English credit at two of your three high schools as a result of the change in graduation requirements is noted. Consistent with your comment that over 80% of your graduates currently earn 4 English credits, the comments received from other school districts indicate that a significant percentage of students are already taking a fourth credit of English, even in districts where only 3 credits are currently required for graduation. Your comment that the district is large enough to absorb the increase of 1 credit of English by offering more sections of English and fewer sections of another offering is consistent with OSPI’s fiscal note indicating that adjustments to staffing and curricula offering during the period of time that the increase in credits for Social studies and English are phased in could be implemented without fiscal cost within the current 20 credit framework. The state’s formula for general apportionment funding would require no additional state dollars in order to address these changes, as districts would have sufficient lead time to make staffing adjustments and modify course offerings for the graduation class of 2016. The SBE

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
		<p>maintain a robust elective program for students that includes art, music, world language, CTE, and health/fitness offerings. (2) The District currently requires 3 credits of Social studies. As long as can modify contemporary world issues course as advised by Board staff to include ½ credit of civics this should be a doable change for the District. If not, we would have a serious objection to this added requirement. (3) The change making Washington State History and Government a noncredit requirement is positive. (4) District had a concern that the proposed rule would impose greater restrictions on waiver eligibility requirements given the language in the proposed draft rule but was advised by Board staff that the “and” in Section 4(b)(i) of WAC 180-51-067 was an error and would be changed to “or” in the final version of the rule if adopted by the Board. (5) The “2 for 1” equivalency for CTE courses in section (7)(a) and (b) of WAC 180-51-067 is a positive change.</p>	<p>understands and appreciates that this change, however, creates planning considerations and additional responsibilities which may not quantify to a state funding cost but are nonetheless important to acknowledge. This understanding led the Board to offer a two year extension for implementation of the increase in English and/or Social studies credits required under this rule. The SBE recognizes that some districts may need to offset the increase of 1 English elective and/or the addition of .5 credits of Social studies through the reduction of electives. However, the number and types of electives, beyond that specifically required by the state, will continue to be entirely within the discretion of the school district. The SBE’s research indicates that many districts require students to graduate with credits far in excess of the 20 currently required for graduation from a state high public high school and further require significant offerings of electives beyond the state minimum. It is expected that for the majority of districts, the addition of 1 English credit, .5 social studies credit, or in some cases both, will not reduce significantly the number of electives and will still allow for the offering of electives in the areas you identified. In any case, the new credit requirements specified in WAC 180-51-067 are intended to bring Washington’s credit requirements in English and Social studies more in line with the other 46 states that have established graduation requirements for public high schools. (2) The district can modify its offering of contemporary world issues to include a .5 credit of civics so long as it includes the content required in RCW 28A.230.093 and is in compliance with the requirement in WAC 180-51-067(4)(d). (3) Your support for the change making Washington State History and Government a noncredit requirement is noted. (4) The SBE appreciates the Northshore School District bringing its attention to the language in subsection 4(b)(i) of WAC 180-51-067. The “and” in this section of the rule was</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
			an error and was changed to “or” in the final version of the rule adopted by the Board. (5) Your comment that the CTE “2 for 1” policy is a positive change is noted.
10/10/11	Entiat	Entiat School District currently requires 4 credits of English and 2.5 credits of Social studies. The District would most likely not be impacted by the proposed ½ increase in Social studies credits required for graduation.	Although Entiat School District will need to add .5 credits of Social studies, your comment that the District currently requires 4 credits of English and will likely not be impacted by the required .5 credit increase in Social studies credits is noted.
10/11/11	Sprague	(1) Sprague School District currently requires 26 credits for graduation. This includes 4 credits in English and 3.5 credits in Social studies. (2) Presently, the .5 Social studies credit for Washington State History can be earned at the Middle School. Due to scheduling factors with shared teachers between middle and high school the district is not able to offer Washington State history at the high school. I see no reason not to allow schools to continue to offer Washington State History at the middle school and earn .5 credits. (3) Many schools cover civics in Contemporary World Problems courses. The addition of .5 of civics could require many small schools to add another class to the schedule. The more flexibility you allow the more Social studies we can offer without added costs. (4) Our Board of Directors feels it is their responsibility to determine what best meets the needs of our students in our community. The District has set higher graduation standards than the state with specific course requirements to fit our student needs. With limited staffing and qualifications for teachers, it becomes increasingly more difficult to make changes the SBE wants and still fill our student needs. (5) In general, for small schools your logic does not necessarily hold up when you say requiring more English and Social studies will have no fiscal impact. If you have limited staffing shared between a middle and high school increasing courses could translate into the need to increase staff which would increase the cost.	(1) Your comment that Sprague School District already requires 3 credits of English and 3.5 credits of Social studies is noted. (2) WAC 180-51-067 allows a school district to offer Washington State History and Government at the middle or high school. If offered at a high school, a school district can elect to award a student credit for Washington State History and Government. If offered at a middle school, a student can still receive credit for the course but only if earned under the circumstances set forth in RCW 28A.230.090. However, under WAC 180-51-067, a student can still satisfy the “non-credit requirement” for Washington State History and Government in middle school. In the latter circumstance, credit is not awarded but satisfactory completion of the requirement must be noted on the students’ transcript. (3) If a school district is currently including a .5 credit of civics meeting the requirements of RCW 28A.230.093, in Contemporary World History, Geography and Problems it can continue to do so and meet the civics requirement under WAC 180-51-067(4)(d). (4) The SBE has been charged by the Legislature with establishing the state’s graduation requirements for students attending public high schools. See, RCW 28A.230.090. The Board recognizes that in some cases, districts (like Sprague) have established graduation requirements that far exceed those set forth in WAC 180-51-067. In these districts, the effect of the increase in graduation requirements will not result in any changes to course offerings. However, the state’s graduation

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
			<p>requirements are intended to insure that all students are prepared to receive instruction in core subject areas that will prepare them for postsecondary education, gainful employment and citizenship. By increasing the credit requirements for English and social studies, the Board intends to help students meet the state’s intent and bring credit expectations of Washington students in line with credit requirements in the other states that have established high school graduation requirements. (5) The Legislature directed OSPI in RCW 28A.230.090 to conduct an independent analysis of the impact of any changes to state graduation requirements. OSPI’s analysis concluded that an increase of 1 English credit and .5 credits of social studies, along with a 1.5 credit reduction in electives, could be implemented without fiscal cost within the current 20 credit framework. The state’s formula for general apportionment funding would require no additional state dollars in order to address these changes, as districts would have sufficient lead time to make staffing adjustments and modify course offerings for the graduation class of 2016. However, in the event a district needs more time to implement the changes, the SBE added language to the final version of WAC 180-51-067 that authorizes a school district to obtain a 2 year extension for implementation of the increase in English and/or social studies credits required under this rule.</p>
10/13/11	Tahoma	<p>The District’s Board passed the following resolution requesting the SBE postpone the increase in graduation requirements. Changes to graduation requirements would force students to select additional social studies credits rather than courses linked to areas of interest or classes that directly support post high school goals. (1) Approximately 40% of students graduate with the minimum District requirement of 2.5 credits of Social studies. The District would need to offer 8 additional sections of Social studies and decrease offerings by the same number of sections in some other area if this rule was adopted. Eight new</p>	<p>Your resolution requesting that the SBE postpone the increase in graduation requirements is noted. (1) You state that “approximately 40% of students graduate with the minimum” district requirement of 2.5 credits, and would need to earn an additional .5 credit to meet the new social studies requirement, requiring the district to staff 8 additional sections. The Legislature directed OSPI in RCW 28A.230.090 to conduct an independent analysis of the impact of any changes to state graduation requirements. OSPI’s analysis concluded that an increase of</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
		<p>sections of social studies is the equivalent of 1.6 teachers. (2) Students completing the 2.5 credits of Social studies are not college bound. Most likely these students would be forced out of CTE or other elective classes to meet the additional .5 Social studies credit. The District could lose 1.6 elective teachers in order to hire the same FTE for Social studies. The SBE’s proposal to increase credits in the academic content areas is designed to ensure that all students are college ready but not all students will or should attend a 4 year college or university. Our college bound students needs are met with the current graduation requirements for Social studies. For many students, career preparation requires vocational training, not a 4 year college degree. We are short changing CTE students in particular by assuming they benefit from the additional social studies credit. These non-college bound students will be forced to sacrifice a relevant CTE class designed to prepare them for the workforce or further vocational training in favor of more social studies content. There are costs to these changes due to associated staffing changes and loss of elective choices for students. The Tahoma SD Board of Directors requests that the State Board of Education thoughtfully consider the implications of raising grad requirements in any content area. These additional academic requirements simply serve to undermine the education of a large segment of our student population that will choose different career prep options than those offered at a 4 year college or university. Let's support these students in accessing a rich vocational program that positions them for work beyond high school and engages these students in areas of strength and passion.</p>	<p>1 English credit and .5 credits of social studies, along with a 1.5 credit reduction in electives, could be implemented without fiscal cost within the current 20 credit framework. The state’s formula for general apportionment funding would require no additional state dollars in order to address these changes, as districts would have sufficient lead time to make staffing adjustments and modify course offerings for the graduation class of 2016. However, in the event a district needs more time to implement the changes, the SBE added language to the final version of WAC 180-51-067 that authorizes a school district to obtain a 2 year extension for implementation of the increase in English and/or social studies credits required under this rule. (2) The SBE recognizes that not all students will attend a four year university. The SBE’s goal in establishing high school graduation requirements is to improve student preparation for post-secondary education, gainful employment, and citizenship, consistent with the basic education requirements of RCW 28A.150.220. Research indicates that 67% of future Washington jobs will require some education beyond high school. Therefore, a key strategy to meet the Board’s goal is to create a coherent and rigorous set of graduation requirements that keeps all options open for students after high school. The new credit requirements specified in WAC 180-51-067 are intended to bring Washington’s credit requirements in English and social studies more in line with the other 46 states that have established graduation requirements for public high schools, and insure that all students receive instruction in core subject areas critical to meeting the SBE’s goal. In addition, the state graduation requirements will continue to require that every student receive a credit in occupational education, thereby reinforcing the importance of Career and Technical Education (CTE) as part of a student’s education. Currently, Washington is one of only 13 states that require all students</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
			to take occupational/career and technical education. Under the “2 for 1” policy, students will have an opportunity to take more courses because they have already met multiple requirements. Additionally, the “2 for 1” policy may encourage more students to take CTE exploratory courses which may open up career possibilities for a student not previously considered.
10/14/11	Tumwater	Any additional requirement of 1 credit of English and ½ credit of Social studies at this time cannot be considered cost neutral even if most districts currently require the graduation requirement credits set forth in WAC 180-51-067. There will likely be at least another \$500 million in cuts to K12 for the current biennium. What if a district has to make major cuts and decides that reducing district graduation requirements is a remedy (i.e., eliminating a fourth year of English or a third year of Social studies) or retaining all day kindergarten is more important than requiring a fourth year of English? Request that the SBE not add requirements during a time that the state continues to slash funds for K12 education, reductions that we can justifiably argue are “Basic Ed”.	Your request that SBE not add additional graduation requirements at this time is noted. The Legislature directed OSPI in RCW 28A.230.090 to conduct an independent analysis of the impact of any changes to state graduation requirements. OSPI’s analysis concluded that an increase of 1 English credit and .5 credits of social studies, along with a 1.5 credit reduction in electives, could be implemented without fiscal cost within the current 20 credit framework. The state’s formula for general apportionment funding would require no additional state dollars in order to address these changes, as districts would have sufficient lead time to make staffing adjustments and modify course offerings for the graduation class of 2016. However, in the event a district needs more time and flexibility to implement the changes, the SBE added language to the final version of WAC 180-51-067 that authorizes a school district to obtain a 2 year extension for implementation of the increase in English and/or social studies credits required under this rule.
10/17/11	Northshore (Board of Directors)	(1)As members of the Northshore School Board, we want to start by emphasizing that the following discussion has nothing to do with not having high expectations for our students. Northshore students have consistently demonstrated that they are receiving a high quality education, with higher than the state average in all measures on the MSP and the HSPE, higher than both the state and national averages on the SAT and ACT and a very high graduation rate. We will continue to have the high expectations of our students that our community demands. That being said, several of the new requirements will not be fiscally	(1) The comment that the Northshore School Board takes pride in upholding high standards for all students is noted, as is the comment that pending legislative budget cuts may significantly hamper school districts’ abilities to offer the same levels of programs and services as they have in the past. The Legislature directed OSPI in RCW 28A.230.090 to conduct an independent analysis of the impact of any changes to state graduation requirements. OSPI’s analysis concluded that an increase of 1 English credit and .5 credits of social studies, along with a 1.5 credit reduction in electives, could

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
		<p>neutral for us, and with the looming special session providing another round of potential budget cuts, we are desperately trying to maintain our rich and diverse educational opportunities for our students. (2) Most specifically, our concern is with the increase of the English requirements from 3 to 4 credits. We currently require 3 years of English at two of our comprehensive high schools and a third requires 4. While most students take that fourth year of English, approx. 225 don't. If this requirement were to pass now, we would be forced to add 7 to 8 more sections of English into our curriculum. (3) Again, keeping with the theme that these students are high achieving students, many of those 225 are opting to take classes from the STEM world, such as additional science, computer programming and even additional math class. Some are using that additional hour to participate in the DECA program where two of our high schools placed 1st and 3rd in the nation. Others use the period to take a 4th year of world language, sustainable engineering and design, intro to robotics, participate in the teaching academy, or take classes with the WA Network for Innovative Careers (WANIC). We have many other career prep classes for our students that will be challenging to add into a high school schedule with an additional English requirement. We haven't even discussed the incredibly valuable arts and fitness programs such as music, drama and journalism. While English is an important class, our students are working towards achieving those skill sets that employers are demanding. With the state only providing 5 periods of funding at the secondary level, and while we work very hard to provide 6 periods, our students are still forced to make some very difficult decisions to meet high school grad requirements, college entrance requirements and gain work place skill sets. Again, this isn't about not having high expectations. Our students attend every high quality post-high school institution in the state and around the country. We will continue to meet their needs. While we don't know what the special session will bring, we do know what the previous ones</p>	<p>be implemented without fiscal cost within the current 20 credit framework. The state's formula for general apportionment funding would require no additional state dollars in order to address these changes, as districts would have sufficient lead time to make staffing adjustments and modify course offerings for the graduation class of 2016. However, in the event a district needs more time and flexibility to implement the changes, the SBE added language to the final version of WAC 180-51-067 that authorizes a school district to obtain a 2 year extension for implementation of the increase in English and/or social studies credits required under this rule. (2) Northshore will need to add 1 credit of English in response to SBE's adoption of WAC 180-51-067. Northshore's Superintendent has indicated in separate correspondence that while there will be some staffing impact which will require the district to offer more English sections and fewer sections of other courses (likely electives), the district's system should be large enough to absorb the changes to the state's graduation requirements set forth in WAC 180-51-067. The SBE feels that 4 credits of English is essential to meeting the Board's goal of providing adequate instruction to Washington's high school students to insure they are prepared for success in postsecondary education, gainful employment, and citizenship. (3) The Board recognizes the value of arts and occupational education by requiring all students to earn 1 credit in each subject; many states either don't require these subjects at all, or require them as a choice from a menu of "prescribed" electives (e.g., 1 credit of arts or occupational education, etc.). These requirements assure that all students will have at least one opportunity to experience these subjects. The SBE recognizes that some districts may need to offset the increase of 1 English credit and/or the addition of .5 credits of Social studies through the reduction of electives. However, the number and types of electives,</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
		have brought, and we don't have the room in our budget to add more state requirements.	beyond that specifically required by the state, will continue to be entirely within the discretion of the school district. The majority of Washington districts require more elective credits than required by the state.
10/18/11	Selah	The Selah School District will be ready for the changes proposed in WAC 180-51-067 and don't think it will be a problem. The average number of seniors who take a full year of English is presently 40%. This counts Running Start students who take the English equivalent of junior and senior English at a community college. The District currently requires all students to earn 3 credits of Social studies.	Your comment that Selah School District is ready for the proposed changes and doesn't anticipate issues in implementing WAC 180-51-067 is noted. The information indicating that the district currently requires 3 credits of social studies is consistent with data gathered by the SBE.
10/19/11	Auburn (Superintendent)	(1) Value endeavors to raise standards and expectations for students but serious concerns that the SBE policy changes may look productive at a macro level but have dire effects at the local level creating even more financial stress than already experiencing. The SBE and the state assessment systems are limiting the flexibility to address student learning within the context of the current fiscal crisis. (2) Approximately 70% of students take 3 or more Social studies credits. An increase of .5 credit for Social studies will prevent the District from providing math and science credit makeup classes and opportunities for ELL and low income students for tiered intervention classes to pass reading, writing, and EOC assessments in math and biology. Districts that have affluent student bodies will continue to take the college credits that the SBE is proposing. The high recidivism for impoverished learners in Social studies will require the District to reassign an AP social studies teacher to comply with the .5 credit increase. (3) The new 2 credits of health and fitness requirement requiring a .5 credit of health is a cost and flexibility item. Most class size for physical education is 40-45 while health classes are 25-30. This will reduce our master schedule efficiencies across the District. (4) The District has scope and sequence for standards and curricula. Courses are not randomly fixed. When you take away or add specific course requirements, it will distort curricular alignment in scope and	(1) The SBE acknowledges Auburn's support for the Board's efforts to raise standards and expectations for students, and its concern about the impact at the local level. The SBE made several policy changes that are intended to provide districts with greater flexibility, including allowing a "2 for 1" policy for Career and Technical Education equivalent classes, providing for Washington State History and Government to be a noncredit requirement, and changing the definition of a credit to be non time-based. The state assessment requirements are established by the Legislature and are not within the authority of the SBE. OSPI has determined in its independent fiscal analysis that implementation of the changes for the class of 2016 (or 2018 with an extension as provided in WAC 180-51-067) will allow adequate time for staffing and course modifications to provide for the requirements to be met without the appropriation of additional state basic education dollars. (2) Your comment indicates that the Auburn School District will need to add an additional .5 credit of social studies for approximately 30% of its students who don't presently take 3 credits of course work in this subject area. The new credit requirements specified in WAC 180-51-067 are intended to insure that all students receive instruction in core subject areas critical to meeting the state's intent that students have

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
		<p>sequence as well as time and effort in other areas of the curriculum. The recent Biology EOC requires a complete revision of middle school science curricula as well as high school alignments. Why? Because without an alignment students would not be proficient in biological science as we are aligned to the MSP and HSPE which includes physical and environmental. The lack of synchronization of testing and graduation requirements as well as attention for the demographics learning needs of students. An ELL student does not need another Social studies or health course to replace programs and courses that directly address reading comprehension skills and language proficiencies. Please create a slack during these fiscal hardships by letting local districts have some room within the master schedule to get to all our students.</p>	<p>the opportunity to complete graduation requirements that are intended to prepare them for postsecondary education, gainful employment, and citizenship (RCW 28A.150.220). In addition, the new social studies requirement will bring Washington more in line with the requirements of other states. With the adoption of WAC 180-51-067, Washington becomes one of 40 states (of 47 with state-mandated requirements) that require 3 or more credits of social studies. What courses are provided, how they are scheduled, and how teachers are assigned, are determined by the district. The SBE acknowledges the importance of providing appropriate intervention opportunities to support students' learning, and recognizes that Auburn will need to make adjustments to program offerings. In adopting the requirement for 3 Social studies credits, SBE recognizes that social studies instruction provides students with understandings in the core content areas of civics, economics, geography and history critical to sustaining an informed democracy and a globally competitive workforce. This instruction is critical for all students to obtain the intellectual skills essential for informed effective and responsible citizenship regardless of whether the student attends a four year institution, a community or technical college, or enters the job force upon graduation from high school. (3) Construction of the master schedule is determined locally, and the SBE acknowledges that this will likely require some staffing adjustments by the district. However, in the event a district needs more time and flexibility to implement the changes, the SBE added language to the final version of WAC 180-51-067 that authorizes a school district to obtain a 2 year extension for implementation of the increase in English and/or social studies credits required under this rule. (4) The SBE recognizes that it is the district's responsibility to coordinate the scope and sequence of curriculum, and that districts must contend with requirements that are imposed by different authorities. State</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
			assessment requirements are determined by the Legislature, and are not within the authority of the SBE. The district determines what courses are provided, how they are scheduled, and how teachers are assigned. The SBE recognizes that responsibility for deciding how best to address individual student needs, including those of ELL students, rests at the local level.
10/20/11	Tacoma	The Tacoma School District currently requires 4 English credits, and most of the District’s students are already earning 3 credits in Social studies. Increasing the number of English credits to 4 and Social studies from 2.5 to 3 credits should not be problematic. Also, with regards to Washington State History, the 90 state-required hours are evenly divided across three social studies classes: eighth grade US History, eleventh grade US History (or AP US), and twelfth grade Civics (or AP government).	Your comments that the district currently requires 4 English credits, that most student currently earn 3credits of social studies, and that an increase in these subject areas will not be problematic is noted. OSPI prescribes a semester-long course or its equivalent in Washington State History and Government, as specified in WAC 392-410-120 . SBE WAC 180-51-050 allows districts to award credit based on satisfactory demonstration by a student of clearly identified competencies established according to a process defined in written district policy, which may be the approach Tacoma has taken. The new noncredit Washington State History and Government requirement will enable students to satisfy the requirement at a middle or high school level, for credit or not for credit, depending upon the academic level of the course. Districts will continue to have flexibility to award competency-based credit. See also, the Board’s FAQ <i>Social studies Graduation Requirements Under WAC 180-51-067</i> at http://www.sbe.wa.gov/documents/FAQ%20Social%20Studies.pdf .
10/24/11	Auburn (Deputy Superintendent)	Applaud the desire of the State Board to raise the standards of achievement for students across Washington State; but, those ‘improvements’ to the system, to match up with requirements in other states, may not meet the needs of our students in local school districts. Ask the Board to consider all the students in our local high schools, their backgrounds, their hopes, and their dreams. Could these be different for each student? Also, ask you to consider the unintended consequences for the very	The SBE acknowledges your support of the Board’s efforts to raise the standards of achievement for students in the state and notes your concern for the impact on students at the local level. With this social studies change, Washington joins 39 other states that require 3 or more credits of social studies for high school graduation. (1) SBE’s data shows that out of 247 Washington State school districts with high school graduates, Auburn School District is one of 28 districts that will be

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
		<p>students that need our assistance the most. (1) Please take a few moments and look deeper into this data. In Auburn, from the graduating Class of 2011; 250 students earned the minimum of 2.5 social studies credits to graduate; another 732 earned 3.0 or more social studies credits. These very same students that met or exceeded our graduation requirement of 2.5 credits in social studies also failed 314 semester credits of social studies. To address the proposed increase in graduation requirements in social studies and have the capability for the additional opportunity to earn the credit(s), this would require our high schools to close out a minimum of 20 sections of electives and add 4.0 FTE social studies staff. Could these electives be the very same programs that keep these students in school? (2) Does increasing the graduation requirements assure that students will be getting a world class education? Or does it place another set of requirements on students, high schools, districts and local school boards? Should the State Board's role be setting the high end of graduation requirements? Or should the State Board's role be setting the minimum graduation requirements and the higher standards set by local school boards? (3) The assumption that this is a NO COST proposal may need to be examined in more detail. Question of cost of additional graduation requirements is only being looked at in the context of number of credits available. Need to consider the alignment with student interest, staffing of school, and the graduation requirements that exist within the local high schools. Local districts are faced with huge fiscal challenges and do not need the additional burden of hiring new staff to meet the new requirements. Information provided by SBE to school districts asking for comment on the proposed changes states that SBE remains committed to no unfunded mandates and will not advocate for adopting changes with costs without the necessary funding. How is this a no cost requirement if districts have to hire staff to teach the new requirements? Is this proposal really now an unfunded mandate? (4) Lastly, I wonder about the policy changes to</p>	<p>required to add .5 credits of social studies required under WAC 180-51-067. (Twelve additional districts will need to add both social studies <u>and</u> English credits.). Given your comments, it appears that the District will need to accomplish this change in part by reducing its current requirement of 7 elective credits. Auburn's practice of providing as many elective opportunities as possible to address student needs is noted. The SBE recognizes that the district will need to balance this commitment with instruction in the core subject areas required under WAC 180-51-067, and that the responsibility for deciding how best to address individual student needs, including those who fail courses, rests at the local level. (2) The SBE has been charged by the Legislature with establishing the state's graduation requirements for students attending public high schools. See, RCW 28A.230.090. The new credit requirements specified in WAC 180-51-067 are intended to insure that all students receive instruction in core subject areas critical to meeting the state's intent that students have the opportunity to complete graduation requirements that are intended to prepare them for postsecondary education, gainful employment, and citizenship (RCW 28A.150.220). (3) The Legislature directed OSPI in RCW 28A.230.090 to conduct an independent analysis of the impact of any changes to state graduation requirements. OSPI's analysis concluded that an increase of 1 English credit and .5 credits of social studies, along with a 1.5 credit reduction in electives, could be implemented without fiscal cost within the current 20 credit framework. The state's formula for general apportionment funding would require no additional state dollars in order to address these changes, as districts would have sufficient lead time to make staffing adjustments and modify course offerings for the graduation class of 2016. However, in the event a district needs more time and flexibility to implement the changes, the SBE added language to the final version of</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
		<p>provide ‘flexibility’ to local districts. If the State Board is advocating increasing graduation requirements, how can flexibility be created at the same time? If requirements increase, doesn’t flexibility go away? How do we create flexibility for our struggling students? Are we actually making it harder for the struggling students to graduate? As you contemplate your decision, please take the needs of the individual student, both the high performing and those struggling students that face challenges, into consideration. You may want to consider delaying all changes, even those that are ‘no cost’, until the state economy has recovered enough to fund the current programs and then the proposed changes.</p>	<p>WAC 180-51-067 that authorizes a school district to obtain a 2 year extension for implementation of the increase in English and/or social studies credits required under this rule. 4) The SBE made several policy changes that are intended to provide districts with greater flexibility, including allowing a “2 for 1” policy for Career and Technical Education equivalent classes, providing for Washington State History and Government to be a noncredit requirement, and changing the definition of a credit to be non time-based. Moreover, the total number of credits for graduation remains at 20 allowing the district to implement the .5 credit change over the next 4 years (6 upon application of an extension). SBE is not proceeding to implement those changes that OSPI has determined will have fiscal costs to school districts.</p>
10/25/10	Blaine	<p>(1) Currently 65% to 75% of the Districts students earn 4 credits of English. An increase to 4 credits of English for all students will require the District to offer two additional sections of English for seniors which will result in the District adjusting staffing from different areas to meet this requirement. This could potentially reduce the offerings in other curricular areas. (2) The District currently requires all students to earn 3 credits of Social studies for graduation. (3) The District would need to increase the number of sections of biology offered if the SBE add biology as a specific requirement. Currently 80% of students take biology. This includes all students who are not on a CTE track. (4) The District will need to adapt a course for civics given the current social studies offerings.</p>	<p>(1) Your comment that 65 to 75% of the district’s students earn 4 credits of English and that the district will need to add two additional English sections is noted. SBE records indicate that Blaine currently requires all students to earn 3.5 credits of English; the requirements of WAC 180-51-067 will necessitate the addition of .5 credits. The district’s strategy to accomplish this change through the adjustment of staffing from different areas and a potential reduction of offerings in other curricular offerings is consistent with OSPI’s independent fiscal analysis. The Legislature directed OSPI in RCW 28A.230.090 to conduct an independent analysis of the impact of any changes to state graduation requirements. OSPI’s analysis concluded that an increase of 1 English credit and .5 credits of social studies, along with a 1.5 credit reduction in electives, could be implemented without fiscal cost within the current 20 credit framework. The state’s formula for general apportionment funding would require no additional state dollars in order to address these changes, as districts would have sufficient lead time to make staffing adjustments and modify course offerings for the graduation class of 2016. However, in the</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
			<p>event a district needs more time and flexibility to implement the changes, the SBE added language to the final version of WAC 180-51-067 that authorizes a school district to obtain a 2 year extension for implementation of the increase in English and/or social studies credits required under this rule. (2) Your comment that the district currently requires 3 credits of social studies is consistent with the Board’s data. (3) The SBE is not proposing the addition of biology as a course requirement at this time. (4) Your comment that the district will need to adapt a course for civics to meet the requirement in WAC 180-51-067(4)(d) is noted.</p>
10/26/11	Manson	<p>Manson School District currently exceeds the 20 credit requirement by 7 credits. The District’s students currently take a world history/geography course so adding the .5 credit of Social studies should be doable. However, it is hard on small districts to always be flexible if it requires adding a teacher.</p>	<p>Your comment that Manson exceeds the state requirement by requiring 27 credits is noted. The Board’s records shows that your district currently requires 4 credits of English. However, the district will need to add .5 credits of social studies, which you have indicated is doable. The increased credit requirements for English and social studies take effect for the class of 2016. The Board acknowledges that small districts may have less staffing flexibility, and expects that the four-year lead time will be sufficient for districts to adjust staffing and change course offerings to meet the credit requirements for one or both of these subject areas. However, in the event a district needs more time to implement the changes, the SBE added language to the final version of WAC 180-51-067 that authorizes a school district to obtain a 2 year extension for implementation of the increase in English and/or social studies credits required under this rule. In addition, the SBE incorporated other changes into the rule (i.e., CTE “2 for 1” option, making Washington State History and Government a “noncredit” offering) that should provide some flexibility to districts incorporating changes to the state’s high school graduation requirements mandated by WAC 180-51-067.</p>
10/27/11	Warden	<p>The proposed rule is a cost issue to some districts that don’t have the capacity for adding English without adding additional</p>	<p>Warden School District currently requires 4 credits of English and 3 credits of English and therefore will not be</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
		<p>teachers. I wish the SBE would wait until there is funding for the change in required credits as in the recommendation from the task force. It seems that little by little additional credits are being added without the money to support the teaching staff, and the materials and technology to set up classrooms. Incremental increases in the number of credits could eventually “phase in” the core 24 requirements with the perception that each new credit does not have a significant cost impact.</p>	<p>required to make changes in response to the increased credit requirements for these subject areas as required under WAC 180-51-067 commencing with the graduating class of 2016. The Legislature directed OSPI in RCW 28A.230.090 to conduct an independent analysis of the impact of any changes to state graduation requirements. OSPI’s analysis concluded that an increase of 1 English credit and .5 credits of social studies, along with a 1.5 credit reduction in electives, could be implemented without fiscal cost within the current 20 credit framework. The state’s formula for general apportionment funding would require no additional state dollars in order to address these changes, as districts would have sufficient lead time to make staffing adjustments and modify course offerings for the graduation class of 2016. However, in the event a district needs more time and flexibility to implement the changes, the SBE added language to the final version of WAC 180-51-067 that authorizes a school district to obtain a 2 year extension for implementation of the increase in English and/or social studies credits required under this rule. The Board remains committed to no unfunded mandates, and signaled formally in its November 2010 resolution that it would move forward only on the specific changes identified by the Office of Superintendent of Public Instruction to have no fiscal costs.</p>
10/31/11	Oroville	<p>The Oroville School District Board of Directors has met and discussed the SBE’s proposed graduation requirement changes and is in full support. (1) Given that we already meet or exceed the Social studies requirement, the additional requirement will be easily implemented. (2) Our current English requirement is 3 credits, but most of our students choose to take a 4th year of English as an elective anyway. Some take a more college prep oriented class while others choose a general English class their senior year. Regardless, increasing this requirement makes good sense to us. Thank you for being proactive and continuing to keep the bar high for Washington State students.</p>	<p>Your support for the changes to the state’s high school graduation requirements included in WAC 180-51-067 is acknowledged. (1) Your comment that the Oroville School District currently meets or exceeds the 3 social studies credit requirement required under this rule is noted. (2) Your comment that most students choose to take a 4th credit of English despite the fact that the district only requires 3 credits and that the additional 1 credit for this subject area is easily implemented is noted. The SBE agrees with Oroville that this requirement makes good sense for Washington State students for the reasons identified in response to other comments</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
			received regarding the rule making process for WAC 180-51-067.
11/1/11	Pomeroy	<p>Pomeroy School District supports the change in graduation requirements now as in the past. However, a word of caution is in order. (1) Any increase in graduation requirements may reduce elective opportunities. (2) Remediation will become more necessary as students are required to pass specific state assessments in order to graduate. Remedial courses will force students out of the electives Pomeroy High School offers as well, such as CTE and the arts. Increasing graduation requirements may at this time demand resources be placed into the creation of more classes as students fail to meet standard on state tests. Classes will have to be funded locally to help students prepare in learning content standards as well as test taking skills. (3) The District should prepare students for postsecondary education, gainful employment and citizenship. We should also prepare students for the life they are living at the moment as technology and knowledge expand exponentially. We must keep in mind that postsecondary education includes more options than a degree from a four year institution. The District needs options as it faces the challenge of working with students who are mature enough to attend a 4 year institution right out of high school and student who need a year or two more of maturity. Please balance high standards with the fact that a student has the choice to quit school at age eighteen without a high school diploma.</p>	<p>Pomeroy School District’s support for the change in graduation requirements is acknowledged. The Board acknowledges that the changes to graduation requirements include fewer state prescribed electives and that districts like Pomeroy needing to make credit changes will have to decide whether to reduce electives in order to provide the same offerings with their apportionment of state dollars. (2) State assessment requirements are designated by the legislature and are not within the authority of the SBE. The SBE recognizes that the responsibility for deciding how best to address individual student needs, including those who fail courses, rests at the local level. The state’s graduation requirements are intended to provide students with academic requirements that will insure success in college and career. An additional year of English may well help those students who currently are unable to meet standard on the state assessment for this subject area. It is not expected that a .5 credit increase in the social studies credit will demand an increase for remedial classes in order to meet standard on a state assessment since none is required for this subject area. (3) Your comment regarding the need to balance options for all students is noted.</p>
11/02/11	Auburn (Board of Directors)	<p>(1)The Auburn School District has faced unprecedented reductions in state support for student achievement as well as dramatic increases in graduation requirements, including credits and changes in high stakes graduation assessments, over the past 3 years. All of these changes result in unfunded mandates that further imperil our efforts to improve student achievement. The District has seen \$13 million dollars in resource reductions since 2008 and the Governor recently called for reduction in levy equalization that will reduce our budget by another \$3million</p>	<p>(1) The Board has advocated for preservation of basic education funding and its expansion according to the implementation of the funding distribution formulas outlined in SHB 2776. In the last three years, the Board has increased the math graduation credit requirement by one credit at the direction of the Legislature. In addition, the Board has added one credit of English and .5 credits of social studies, while reducing electives by 1.5 credits in order to stay within the current 20 credit framework. The Legislature directed OSPI</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
		<p>dollars. (2) The proposed increase in graduation requirements in Social studies will have the greatest negative impact on 30% who are mostly low income, ELL, and special education students who will now have to take an additional ½ credit of social studies instead of receiving tiered intervention assistance for math, science, reading, and writing. How do we close the achievement gap for a student with a social studies requirement? (3) District wide we will have to add 4 FTE Social studies certified teachers (\$280,000) because of the new requirement. Sure we can do away with electives like AP classes, intervention courses, CTE programs, music and arts so we can implement the requirement. But the SBE compromises local authority to best serve students. An increase in state requirements by the SBE is grounded in good intentions but creates unintended ceiling that compromises the District’s ability to bring all students to standard and beyond. During the hard times, we need flexibility to do the latter and harness to the District’s efforts. Avoid more policy endeavors that have unintended consequences that inflame the fiscal crisis of the District and state.</p>	<p>in RCW 28A.230.090 to conduct an independent analysis of the impact of any changes to state graduation requirements. OSPI’s analysis concluded that an increase of 1 English credit and .5 credits of social studies, along with a 1.5 credit reduction in electives, could be implemented without fiscal cost within the current 20 credit framework. The state’s formula for general apportionment funding would require no additional state dollars in order to address these changes, as districts would have sufficient lead time to make staffing adjustments and modify course offerings for the graduation class of 2016. However, in the event a district needs more time to implement the changes, the SBE added language to the final version of WAC 180-51-067 that authorizes a school district to obtain a 2 year extension for implementation of the increase in English and/or Social studies credits required under this rule. (2) Your comment indicates that the Auburn School District will need to add an additional .5 credit of social studies for approximately 30% of its students who don’t presently take 3 credits of course work in this subject area. The new credit requirements specified in WAC 180-51-067 are intended to insure that all students receive instruction in core subject areas critical to meeting the state’s intent that students have the opportunity to complete graduation requirements that are intended to prepare them for postsecondary education, gainful employment, and citizenship (RCW 28A.150.220). In addition, the new social studies requirement will bring Washington more in line with the requirements of other states. With the adoption of WAC 180-51-067, Washington becomes one of 40 states (of 47 with state-mandated requirements) that require 3 or more credits of social studies. What courses are provided, how they are scheduled, and how teachers are assigned, are determined by the district. The SBE acknowledges the importance of providing appropriate intervention opportunities to support students’ learning, and</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
			<p>recognizes that Auburn will need to make adjustments to program offerings. In adopting the requirement for 3 Social studies credits, SBE recognizes that social studies instruction provides students with understandings in the core content areas of civics, economics, geography and history critical to sustaining and informed democracy and a globally competitive workforce. This instruction is critical for all students to obtain the intellectual skills essential for informed effective and responsible citizenship regardless of whether the student attends a four year institution, a community or technical college, or enters the job force upon graduation from high school. (3) By increasing the credit requirements for English and social studies, the Board intends to help students meet the state’s intent for students to be prepared for life after high school and to bring credit expectations of Washington students in line with credit requirements in the other states that have established high school graduation requirements.</p>
11/03/11	Mead	<p>Now is not the appropriate time to add specific graduation requirements that include fiscal costs we can’t afford and that aren’t fully and adequately funded. The District’s responsibilities are made more difficult when essentially “unfunded mandates” are imposed on top of continuing budget reductions. We recognize and appreciate the SBE’s desire to have all Washington’s students graduate from high school college and career ready and share and are implementing that goal now. However, without adequate resources to support additions and modifications to current graduation requirements, the positive intent behind those changes will be compromised. We share a commitment to high, yet fair, standards for all students in our state and believe the attainment of such high standards by students is dependent on adequate and ample resources provided to the schools and districts that serve them. Please consider not implementing more requirements at a time when resources are dwindling, thereby substantially impacting</p>	<p>Your request that SBE consider not implementing more requirements at this time is noted. SBE’s data shows that Mead School District will need to add 1 credit of English in response to the change in high school graduation requirements set forth in WAC 180-51-067. The Legislature directed OSPI in RCW 28A.230.090 to conduct an independent analysis of the impact of any changes to state graduation requirements. OSPI’s analysis concluded that an increase of 1 English Credit and .5 credits of social studies, along with a 1.5 credit reduction in electives, could be implemented without fiscal cost within the current 20 credit framework. The state’s formula for general apportionment funding would require no additional state dollars in order to address these changes, as districts would have sufficient lead time to make staffing adjustments and modify course offerings for the graduation class of 2016. However, in the event a district needs more time to implement the changes,</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
		the great programs we already provide our students.	the SBE added language to the final version of WAC 180-51-067 that authorizes a school district to obtain a 2 year extension for implementation of the increase in English and/or social studies credits required under this rule.
11/03/11	Riverside	<p>The Riverside School District recognizes the value in high standards and accompanying expectations for our graduates. The District has long expected its students to complete 4 years of English and 3 years of history. However, this has been a local choice. Given the current financial outlook, the District may have to revisit this choice but in the end this must be a local decision. The SBE made a commitment to districts not to add local financial expectations unless the state fully funded their initiative. There's no evidence of any financial assistance from the state that aligns with the proposed additional requirements. The District will be in a situation of reducing our spending as a result of declining state revenue. We recognize and appreciate the SBE's desire to have all Washington students graduate from high school college and career ready. We believe we share and are already implementing the same goal right now. We don't need additional requirements imposed that aren't fully and adequately funded. Without adequate resources to support additions and changes to current graduation requirements, the positive intent behind these changes will be compromised. We share a commitment to high, yet fair, standards for all students in our state, and we believe strongly that the assurance that all students can reach such standards is dependent on adequate and ample resources provided the schools and districts which serve them.</p>	<p>The SBE acknowledges and appreciates Riverside School District's leadership in requiring students to complete 4 credits of English and 3.5 credits of social studies. The SBE is exercising its legislatively-delegated authority to ensure that all students meet graduation requirements that will prepare them for postsecondary education, gainful employment and citizenship, and has set in motion a process to raise Washington's expectations for its students to levels expected in other states. Washington's credit requirements for students in the graduating class of 2012 are the same as the credit requirements for the class of 1985. The Legislature directed OSPI in RCW 28A.230.090 to conduct an independent analysis of the impact of any changes to state graduation requirements. OSPI's analysis concluded that an increase of 1 English credit and .5 credits of social studies, along with a 1.5 credit reduction in electives, could be implemented without fiscal cost within the current 20 credit framework. The state's formula for general apportionment funding would require no additional state dollars in order to address these changes, as districts would have sufficient lead time to make staffing adjustments and modify course offerings for the graduation class of 2016. However, in the event a district needs more time to implement the changes, the SBE added language to the final version of WAC 180-51-067 that authorizes a school district to obtain a 2 year extension for implementation of the increase in English and/or social studies credits required under this rule.</p>
11/03/11	Spokane County Superintendents (Central Valley, Cheney, Deer	Respectfully submit that now is not the appropriate time to add specific requirements that include fiscal costs that our school districts can't afford. As superintendents of 14 school districts we, along with our school boards and staff, continue to work	Your commitment to high, fair standards and your request that SBE consider not implementing more requirements at this time is noted. The Board appreciates input from all school districts, regardless of how the newly adopted rules

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
	Park, East Valley, Freeman, Great Northern, Liberty, Mead, Medical Lake, Nine Mile falls, Orchard Prairie, Riverside, Spokane, West Valley NEWESD 101)	hard in support of the highest quality student learning. Our responsibilities are made more difficult when essentially “unfunded mandates” are imposed on top of continued budget reductions. While we recognize and appreciate SBE’s desire to have all of students graduate from high school college and career ready, we believe we share and are implementing the same goal right now and don’t need additional requirements imposed that aren’t fully and adequately funded. Without adequate resources to support additions and changes to current graduation requirements, the positive intent behind these changes will be compromised. We share a commitment to high, yet fair, standards for all students in our state, and we believe strongly that the assurance that all students can reach such standards is dependent on adequate and ample resources provided the schools and districts which serve them.	may impact them, and notes that four of the school districts will need to make changes to their English and/or social studies requirements. The Board acknowledges these proposed changes occur at a very challenging time for school districts. For this reason, the Board made a two year extension process available to allow more time for districts to make the needed changes. In moving forward with the rule change, the Board followed the procedures established in statute, including the procedures for the determination of costs.
11/03/11	Sumner	The move to enact the "no fiscal cost" requirements of the SBE graduation requirement proposal will have staff and financial implications for the Sumner School District (SSD). There is no compelling need to move ahead with changes in credit requirements for the class of 2016 and doing so will negatively impact our students. (1) 4 credits of English is currently a requirement for Sumner as well as most Washington school districts. There is no need to make a state level change. (2) .5 credits of civics can be, and is in Sumner, accomplished without increasing the total number of social studies credit requirements. An additional credit requirement will mean increasing social studies instructors and additional material costs for the district. This change alone would cost Sumner two additional staff members (one Social studies teacher at each HS) plus materials and training. We estimate that to be just about \$215,000-\$220,000. (3) In regards to making successful completion of Washington State History and Government a non-credit requirement, most Sumner School District students use the non-credit option for Washington State History and Government as currently allowed by WAC 180-51-066. There is no need to	Your concern that the new graduation requirements will have staff and financial implications for the district is noted. (1) Sumner School District is correct in noting that the majority of the state’s districts with high schools (203 out of 247), including Sumner, currently require 4 credits of English for graduation. The SBE’s adoption of WAC 180-51-067 will insure that the remaining 44 school districts provide the same level of instruction. Significantly, of the 47 states that have high school graduation requirements, with the adoption of WAC 180-51-067, California is now the only remaining state that does not require 4 credits of English. (2) The SBE is mandated under RCW 28A.230.093 to require at least .5 credit of coursework in civics if an increase in the number of course credits in social studies is required for high school graduation. A school district like Sumner that currently requires 3 credits of Social studies and provides .5 credits of civics as part of that offering will be able to accomplish this by reallocating its existing social studies credits to provide for .5 credits of instruction in civics. In Sumner’s case, it appears that this is not necessary given your comment that

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
		<p>make a State level change. (3) In the SSD the .5 health is in place within our 2 credits of health and fitness requirement. Students are able to select an additional health course to meet their Health and Fitness requirement. A change to .5 health and 1.5 fitness would prevent students from electing a second health class to meet the requirement, reducing opportunities for health instruction. (4) Recent increases in State requirements have already reduced the electives we have available for students. Further reduction of opportunities for students would be detrimental to Sumner School District students. (5) The "two for one" CTE policy is currently available to school districts through WAC 180-51-025. There is no need to make a State level change. (6) The move to enact the "no fiscal cost" requirements of the SBE gradation requirement proposal will have staff and financial implications for the Sumner School District. There is no compelling need to move ahead with changes in credit requirements for the class of 2016 and doing so will negatively impact our students. Enacting the proposed changes in graduation requirements would result in unnecessary changes to Sumner School District board policy, impact high school staffing configurations and decrease opportunities for our students to focus on particular courses and programs that best meet their postsecondary plans. Additionally, the SBE proposed changes in course and credit requirements are not cost neutral; there would be a negative fiscal impact on the Sumner School District of over \$200,000. In the Sumner School District, we are committed to preparing every student for success beyond high school. This involves not only rigorous academic requirements, but also opportunities for students to select courses that fit their strengths, interests and individual plans.</p>	<p>the district currently offers .5 credits of civics instruction as part of its 3 credits of required social studies coursework for graduation. Moreover, the district can modify its offering of contemporary world problems to include .5 credit of civics so long as it includes the content required in RCW 28A.230.093 and is in compliance with the requirement in WAC 180-51-067(4)(d). See also, the Board's FAQ <i>Social studies Graduation Requirements Under WAC 180-51-067</i> at http://www.sbe.wa.gov/documents/FAQ%20Social%20Studies.pdf. (2) Please note that WAC 180-51-066 does not currently provide a noncredit option for Washington State History and Government. The SBE has incorporated this change into WAC 180-51-067, providing for Washington State History and Government to be a non-credit requirement effective for students in the graduating class of 2016 and forward. (3) You are correct that WAC 180-51-067 will require that all students take 1.5 credits of fitness and a .5 credit of health. Commencing with the graduating class of 2016, this will prevent a student from taking a second health class to satisfy this graduation requirement. However, students will still be able to take a second .5 credit of health as an elective, should they choose to do so. (4) SBE's research indicates that Sumner School District currently requires 4 credits of English and 3 credits of social studies for graduation. Therefore, it does not appear that the district will be required to reduce its elective offerings in response to the Board's increase of credits in these two subject areas as provided in WAC 180-51-067, and at its discretion, may maintain its current 7 elective credit requirements. (5) WAC 180-51-025 acknowledges that districts shall determine whether a particular course may satisfy more than one subject area requirement. A district may determine, for example, that a physics course contains enough math to satisfy a science or a math requirement. Under this scenario, the student takes one course and meets</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
			<p>one requirement (either math or science, in this example). The new “2 for 1” policy applies to CTE-equivalent courses and enables students to take one course, earn one credit, and satisfy two graduation requirements. (6) The Legislature directed OSPI in RCW 28A.230.090 to conduct an independent analysis of the impact of any changes to state graduation requirements. OSPI’s analysis concluded that an increase of 1 English credit and .5 credits of social studies, along with a 1.5 credit reduction in electives, could be implemented without fiscal cost within the current 20 credit framework. The state’s formula for general apportionment funding would require no additional state dollars in order to address these changes, as districts would have sufficient lead time to make staffing adjustments and modify course offerings for the graduation class of 2016. The Board acknowledges these proposed changes occur at a very challenging time for school districts. For this reason, the Board made a two year extension process available to allow more time for districts to make the needed changes.</p>
11/03/11	Winlock	<p>Request SBE reconsider proposal to increase high school English and Social studies credits. A good portion of the District’s students do not attend a four year university. While support preparing students for college at a very early age, also need to have options available for students who enter high school and want to travel a different path. Some of our students are choosing trade schools and two year vocational programs. By decreasing electives, the SBE limits the opportunities for students to explore vocational programs at the high school level. Students need the flexibility to explore CTE offerings.</p>	<p>Your request that SBE consider not implementing more requirements at this time is noted. SBE’s research shows that Winlock School District currently requires 28 credits for graduation, including 12 credits of electives, and meets or exceeds the graduation requirements for English and social studies required under WAC 180-51-067 that will take effect for students graduating from high school in the year 2016. Consequently, the district will not require modification of its existing graduation requirements and will not need to reduce its elective offerings for reasons related to the changes noted in WAC 180-51-067. The SBE recognizes that not all students will attend a four year university. The SBE’s goal in establishing high school graduation is to improve student preparation for post-secondary education, gainful employment, and citizenship. Research indicates that 67% of future Washington jobs will require some education beyond</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
			<p>high school. Therefore, a key strategy to meet the Board’s goal is to create a coherent and rigorous set of graduation requirements that keeps all options open for students, including those students who don’t elect to pursue an education at a four-year institution. SBE is moving forward in pursuit of this goal, and as authorized under RCW 28A.230.090, by implementing only the credit increases in English and social studies requirements.</p>
11/03/11	Wenatchee	<p>(1) Wenatchee School District currently requires 3 credits of Social studies so there is no impact from the proposal to increase by .5 credits the required Social studies credits. (2) The District currently requires 2 credits of Health and Fitness with .5 of a credit of health so no impact; (3) The District currently requires 3.5 credits so the additional .5 credit of English will have an associated cost. We would have to offer somewhere between 5 and 10 additional sections, which is between 1 and 2 additional FTE at a cost between \$72,000 and \$144,000. We usually plan for \$100 per kid when estimating instructional materials, so we would have between \$15,000 and \$30,000 in materials. (4) The biggest challenge of these proposals is the reduction in electives. This will likely result in fewer students enrolled in elective classes and will result in overstaffing in elective areas. With the highly qualified staffing requirements, we will be challenged to figure out what to do with staff who are not qualified to teach in other areas. Being overstaffed according to the state formula has a cost, but it is impossible to estimate the financial impact at this point. In all likelihood our CTE and music programs would suffer significantly.</p>	<p>(1) Your comment that the .5 credit increase in social studies credits will have no impact on the Wenatchee School District due to its current requirement of 3 credits is noted. (2) Your comment that the .5 credits of health required as part of the 2 credits of Health and Fitness will have no impact given that the district currently requires this for graduation is noted. (3) Your comment that the district will have an increase in costs to add an additional .5 credit of English is noted. The Legislature directed OSPI in RCW 28A.230.090 to conduct an independent analysis of the impact of any changes to state graduation requirements. OSPI’s analysis concluded that an increase of 1 English credit and .5 credits of social studies, along with a 1.5 credit reduction in electives, could be implemented without fiscal cost within the current 20 credit framework. The state’s formula for general apportionment funding would require no additional state dollars in order to address these changes, as districts would have sufficient lead time to make staffing adjustments and modify course offerings for the graduation class of 2016. The Board acknowledges these proposed changes occur at a very challenging time for school districts. For this reason, the Board made a two year extension process available to allow more time for districts to make the needed changes. (4) Your concern regarding a reduction in electives is noted. The SBE acknowledges that some districts may need to offset the increase of English and/or social studies credits through reduction of electives. However, the number and types of</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
			<p>electives, beyond that specifically required by the state, will continue to be entirely within the discretion of the school district. The SBE recognizes the value of arts and occupational education/CTE by requiring all students to earn 1 credit in each subject; many states either don't require these subjects at all, or require them as a choice from a menu of "prescribed" electives (e.g., 1 credit of arts or occupational education, etc.). The state requirements assure that all students will have at least one opportunity to experience these subjects. The SBE recognizes that districts like Wenatchee that require more than the state-mandated occupational education and elective credits provide additional opportunities to meet the interests of students.</p>
11/03/11	Seattle Public Schools	<p>Please accept this letter in support of SBE's recommendation to raise the high school graduation standards. (1) We are strongly in favor of increasing the Language Arts graduation requirement from 3 to 4 credits. This will bring Washington State high school graduation requirements in line with the entrance requirements of our colleges and universities, and with the rest of the nation with states that have statewide graduation requirements. We believe this increase will cost our district between \$1 and \$2 million dollars, both in increased staffing to add additional course sections and in potential additional remediation for those students who need additional support to meet the new requirements. (2) We also support the increase in social studies requirements by .5 credits. Seattle Public Schools has required 3 credits in social studies for a number of years, and we believe it benefits our students. (3) We especially want to note our support for the "two for one" policy for students taking CTE courses. This will open up spaces in students' schedules to take more courses because they have already met multiple requirements. We also hope this will encourage more students to take CTE exploratory courses which may open up career possibilities for them they had not previously considered. (4) Our district, like all districts, is facing an unprecedented</p>	<p>Seattle Public Schools' support for SBE's changes to the state's high school graduation requirements is noted. As you note, the increase of 1 credit in English will bring Washington State in line with the entrance requirements of its colleges and universities and with all but one of the other 46 states that have high school graduation requirements. Your comment that the increase of one credit of English will cost the district to add staffing, more course sections, and potentially remediation opportunities for students who need support to meet the new requirement is noted. The Board is offering a 2 year extension for the purposes of assisting districts in making the necessary adjustments to course offerings. (2) Your support for the increase of .5 credits in social studies and comment that Seattle Public Schools has required 3 credits of Social studies for a number of years is noted. The SBE agrees with the district's assessment that 3 credits of Social studies for high school graduation is beneficial to students. (3) The SBE acknowledges your support for the "2 for 1" policy for CTE equivalent courses in WAC 180-51-067. (4) SBE appreciates Seattle Public Schools' support for implementing the remaining credit requirements when funding becomes available.</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
		<p>budget crisis which every day seems to worsen. Because of the budget situation, we appreciate your interest in keeping graduation requirement increases as cost neutral as possible. However, we also support the SBE's continued push to more rigorous standards overall. We continue to support the overall concept of "CORE 24", and as budgets start to stabilize we will look to your leadership behind increasing math and science requirements, and possibly adding a world language requirement. This year we are evaluating what will be necessary for us to increase our graduation requirements towards the Core 24 or college entrance requirements. While we don't yet know the timeline for implementing changes, nor the cost, it's important for us to move as quickly as possible towards higher standards. We will be happy to update you on our findings as we move forward. Our mission at Seattle Public Schools is to ensure that each of our students graduates ready for college, career and life. Rigorous grad requirements supported by high quality instructional practices will ensure that all doors are open to our students when they walk across the graduation stage. Please let us know if there's anything we can do to further support this important work.</p>	
11/03/11	Mukilteo	<p>We support the goal of the SBE to increase the rigor of Washington's graduation requirements; we understand that this reflects your commitment to education reform and improving the quality of education for our students. We also appreciate that the SBE has stated that it will adopt only those rule changes for the class of 2016 that will not add any costs to local school districts. We support the principle of limiting rule changes to those that have no cost impact on local districts. (1) We have prepared our own analysis of the proposed changes, which does not entirely support the OSPI conclusion that these proposed rule changes will not increase costs for local school districts. Mukilteo School District already requires more total credits than the state's minimum credit requirement for high school graduation. That may not be the case for other districts and their</p>	<p>The SBE appreciates Mukilteo's support of increased rigor in graduation requirements. Your concern that SBE's adoption of the changes to the state's graduation requirements in WAC 180-51-067 will incur some costs is noted. The Legislature directed OSPI in RCW 28A.230.090 to conduct an independent analysis of the impact of any changes to state graduation requirements. OSPI's analysis concluded that an increase of 1 English credit and .5 credits of social studies, along with a 1.5 credit reduction in electives, could be implemented without fiscal cost within the current 20 credit framework. The state's formula for general apportionment funding would require no additional state dollars in order to address these changes, as districts would have sufficient lead time to make staffing adjustments and modify course</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
		<p>costs of implementing the new requirements may vary from ours. We used credit data from the class of 2010 to determine how many students in that class would have met the SBE proposed English and Social studies credit requirements. (1) Mukilteo School District currently requires 3.5 credits of English to graduate. In the class of 2010, 79% of the students completed four or more English credits. Even though most of our graduates already complete four or more English credits, there will be some cost involved if the minimum requirement is increased to four credits. Class of 2010 Number of Credits Short of 4.0 English: English Credits, 147; Additional Sections, 6; Teacher FTE, 1.2; Additional Classrooms, 1. We think that initially about half of the additional sections could be filled by current elective teachers who can be certified in English. We estimate the following additional costs to implement the new requirements: Additional staff: 0.6 FTE @ \$85,000 = \$51,000. Professional Development: 0.6 FTE @ \$8,500 per teacher for reendorsement = \$5,100. Instructional Materials: English (6 additional sections) =\$16,000. Total first year costs: \$72,100. On-going costs (3-4 years): \$51,000. We assume that over time, teacher attrition in elective subjects will offset the excess staffing costs for the additional English sections and the classes can be absorbed into existing classroom space. (2) Mukilteo already requires three credits of Social studies to graduate. There will be some course changes required to meet the 0.5 credit Civics requirement, but we do not believe that this will create additional costs. In the Class of 2010, 87% of students completed three or more credits of Social studies. (3) CTE “Two for One” and Reduction in Minimum Elective Credits. With both of these changes, it is impossible to predict personnel and cost impacts with any certainty. Both changes could result in significant shifts in course enrollment trends, which could result in elective programs having surplus teachers who cannot be reassigned to teach other subjects without substantial retraining in order to meet endorsement and federal Highly</p>	<p>offerings for the graduation class of 2016. However, in the event a district needs more time to implement the changes, the SBE added language to the final version of WAC 180-51-067 that authorizes a school district to obtain a 2 year extension for implementation of the increase in English and/or social studies credits required under this rule. (1) Your analysis of the costs Mukilteo will likely incur in order to add .5 credits of English for all students in the class of 2016 is noted. (2) Your analysis that the addition of the .5 credits of civics can be made without additional costs within Mukilteo’s 3-credits social studies requirement is noted. (3) Your uncertainty about the impact of the new “2 for 1” policy and reduced state-mandated electives on costs and staffing is noted. The SBE is holding off on making additional graduation requirements changes that were determined by OSPI to have fiscal costs.</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
		<p>Qualified Teacher requirements. In the transition period, it is likely that we would be in a position of maintaining an excess number of elective teachers, increasing high school staffing costs as well. In summary, Mukilteo School District supports the SBE proposal to change credit requirements that truly have no cost to implement. We urge the SBE to hold off on changes that will increase our operating costs until the state is able and willing to fund new mandates. We also hope that the Board will give more consideration to the less predictable, but real costs associated with enrollment pattern shifts that can result in large numbers of surplus staff who will need to be retrained in new subject areas or adversely impacted by changes in high school credit requirements.</p>	
11/04/11	<p>Panorama Superintendents (Chewelah, Columbia, Colville, Curlew, Cusick, Evergreen and Summit Valley, Incehlum, Keller, Kettle Falls, loon Lake, Mary Walker, Newport, Northport, Onion Creek, Orient and Valley, Republic, Selkirk, Wellpint</p>	<p>As the SBE continues its discussions relative to graduation requirements, we respectfully submit that now is not the appropriate time to add specific requirements that include fiscal costs we can't afford. (1) The current fiscal demands in our small schools has forced many districts to eliminate elective courses, combine classes, and assign teachers to areas they are not highly qualified as defined by NCLB. (2) While we appreciate the efforts of the Board to allow for cross crediting through CTE courses, not all of our small districts have the capacity for a diverse CTE program. In addition, for those districts that have vibrant programs, the blending of academic and CTE courses cause great concern for the integrity of both courses. (3) The continued narrowing of electives forces our students out of programs our schools and parent value passionately. We, along with our local school boards, and the staff in our districts continue to work hard in support of the highest quality student learning. Our responsibilities are made much more difficult when essentially "unfunded mandates" are imposed on top of continued budget reductions. We share a commitment to high, yet fair, standards for all students in our state, and we believe strongly that the assurance that all students can reach such standards is dependent on adequate and ample resources</p>	<p>Your request that SBE consider not implementing more requirements at this time is noted. The Board values input from all school districts, regardless of how they may individually be impacted by the new credit requirements. To better understand the concerns of the 20 school districts that comprise the Panorama Superintendents, the Board looked at each district's graduation requirements, including the three that will need to make changes to provide for the increase in English and/or Social studies credit requirements enacted under WAC 180-51-067. (1) Your concerns about the impact of fiscal demands on small schools is noted. The Legislature directed OSPI in RCW 28A.230.090 to conduct an independent analysis of the impact of any changes to state graduation requirements. OSPI's analysis concluded that an increase of 1 English credit and .5 credits of social studies, along with a 1.5 credit reduction in electives, could be implemented without fiscal cost within the current 20 credit framework. The state's formula for general apportionment funding would require no additional state dollars in order to address these changes, as districts would have sufficient lead time to make staffing adjustments and modify course offerings for the graduation class of 2016. However, in the</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
		provided the schools and districts that serve them.	event a district needs more time and flexibility to implement the changes, the SBE added language to the final version of WAC 180-51-067 that authorizes a school district to obtain a 2 year extension for implementation of the increase in English and/or social studies credits required under this rule. (2) While the school districts that comprise those represented by the Panorama Superintendents may not have the variety of CTE offerings, many require more than the state-mandated one credit of occupational education. The allowance for cross crediting should be helpful to the existing offerings of these districts. Your concern for blending of academic and CTE courses is noted. OSPI has provided guidance on these issues by developing the Equivalency Credit Toolkit 3.2 , an implementation guide for local school districts. (3) SBE remains committed to no unfunded mandates. For this reason, it is moving forward only with changes identified by the Office of Superintendent of Public Instruction as having no fiscal costs.
11/04/11	Lake Washington	The Lake Washington School District (LWSD) Board of Directors and Superintendent is fully supportive of SBE’s proposal regarding increasing minimum state credit-based graduation requirement. Specifically, LWSD fully supports SBE’s recommendation to: increase English from 3 credits to 4 credits; increase social studies from 2.5 credits to 3 credits with .5 credit of civics required; make successful completion of Washington State History and Government a non-credit requirement; clarify the 2 credits of health and fitness includes .5 credits of health and 1.5 credits of fitness; and, create a “two for one” policy that would enable districts taking a CTE-equivalent course to satisfy two graduation requirements while earning one credit. (1) LWSD already has a 4 credit English requirement and a 3 credit social studies requirement in place for our students. With regard to the .5 civics requirement, we will need to review our curriculum to ensure alignment with the requirement. Further, LWSD currently requires 22 credits for	Your support for the changes to the state’s high school graduation requirements is noted. (1) Your comment that the district currently requires 4 credits of English and 3 credits of social studies and therefore will not experience any decrease in electives due to the increased credits for these subject areas is consistent with SBE’s data. (2) Your comment that the district currently requires .5 credits of health and 1.5 credits of fitness for graduation and supports the non-credit requirement for Washington State History and Government is noted. (3) Your support for the “2 for 1” policy in WAC 180-51-067 is noted. The intent was to provide more flexibility and options for students pursuing elective choices. (4) Support for SBE’s changes to the requirement for physical education by reference to district’s authority to excuse student from the fitness requirement under RCW 28A.230.050 is noted. As provided in WAC 180-51-050, a district has the authority to award credit for a student based

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
		<p>graduation, so students in LWSD will not experience a decrease in electives based on the proposed additions in English and social studies. (2) LWSD supports the non-credit requirement for Washington State History and Government as well as the clarification regarding health and fitness as we already require .5 credits of health and 1.5 credits of PE for graduation. (3) Finally, we support the “two for one” policy as it potentially provides more flexibility and options for students in pursuing elective choices. (4) In addition, LWSD is also fully supportive of SBE’s proposal to clarify redundant and/or confusing WAC language, especially with regard to proposed changes related to physical education found in WAC 180-51-066, referencing RCW 28A.230. We believe these proposed changes will help to clarify the requirements pertaining to physical education, the conditions under which students may be excused from physical education, and the requirement such excused students have to demonstrate proficiency/competency in the knowledge portion of the fitness requirement. However, implementation of this new competency/proficiency requirement is not without cost, as students not enrolled in a physical education class will need to access assessments in order to demonstrate proficiency/competency in the knowledge portion of the fitness requirement. Such assessments require require administration/proctoring, grading, tracking, etc., requiring resources and personnel.</p>	<p>on demonstration of competency/proficiency. While it may be accurate to say that “implementation of a competency/proficiency requirement is not without cost,” the requirement that students excused from the physical portion of the fitness requirement under RCW 28A.230.050 must demonstrate the knowledge portion of the fitness requirement is not new, and is contained in the language of WAC 180-51-066(1)(e)(i). OSPI staff leadership in health and fitness can provide guidance about the ways districts are currently satisfying this requirement.</p>
11/07/11	Bi-County Superintendents (Almira, Harrington, Lind Ritzville, Sprague, Creston, Lamont, Odessa, Washtucna, Davenport, Liberty, Reardan-	(1) As the State Board of Education continues its discussions relative to graduation requirements, we respectfully submit that now is not the appropriate time to add specific requirements that include fiscal costs we can't afford. The current fiscal demands in our small schools has forced many Districts to eliminate elective courses, combine classes, and assign teachers to areas they aren't highly qualified as defined by NCLB. (2) While we appreciate the efforts of the Board to allow for cross crediting through CTE courses, not all of our small Districts have the capacity for a diverse CTE program. In addition, for those	(1) Your opposition to SBE’s adoption at this time of the changes to the state’s graduation requirements in WAC 180-51-067 is noted. The Board acknowledges these proposed changes occur at a very challenging time for school districts, and appreciates feedback from all school districts, regardless of how the new requirements and flexibility provisions may impact them individually. The Board recognizes that all but one of the districts with high schools represented by the Bi-County superintendents has already made the English and social studies changes contained in WAC 180-51-067. The

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
	Edwall, Wilbur)	<p>districts that have vibrant programs, the blending of academic and CTE courses cause great concern for the integrity of both courses. (3) The continued narrowing of electives forces our students out of programs our schools and parents value passionately. (4) We, our local school boards, and the staff in our districts continue to work hard in support of the highest quality student learning. Our responsibilities are made much more difficult when essentially "unfunded mandates" are imposed on top of continued budget reductions. We share a commitment to high, yet fair, standards for all students in our state, and we believe strongly that the assurance that all students can reach such standards is dependent on adequate and ample resources provided the schools and districts which serve them.</p>	<p>Legislature directed OSPI in RCW 28A.230.090 to conduct an independent analysis of the impact of any changes to state graduation requirements. OSPI's analysis concluded that an increase of 1 English credit and .5 credits of social studies, along with a 1.5 reduction in electives, could be implemented without fiscal cost within the current 20 credit framework. The state's formula for general apportionment funding would require no additional state dollars in order to address these changes, as districts would have sufficient lead time to make staffing adjustments and modify course offerings for the graduation class of 2016. However, in the event a district needs more time and flexibility to implement the changes, the SBE added language to the final version of WAC 180-51-067 that authorizes a school district to obtain a 2 year extension for implementation of the increase in English and/or Social studies credits required under this rule. (2) While some of the school districts that comprise those represented by the Bi-County Superintendents may not have the variety of CTE offerings of other Districts, many require more than the state-mandated one credit of occupational education. The allowance for cross crediting should be helpful to the existing offerings of these districts. Your concern for blending of academic and CTE courses is noted. OSPI has provided guidance on these issues by developing the Equivalency Credit Toolkit 3.2, an implementation guide for local school districts. (3) The changes to the graduation requirements are intended to insure that all students are prepared to receive instruction in core subject areas that will prepare them for postsecondary education, gainful employment and citizenship. By increasing the credit requirements for English and social studies, the Board intends to help students meet this objective and bring the state's credit requirements in line with those in the other states that have established high school graduation requirements. Washington school districts have traditionally</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
			<p>placed a high value on elective offerings, as evidenced by the majority of districts that require more than the state-mandated minimum number of electives for graduation. School districts will continue to have extensive discretion over the number of electives they require for graduation. Districts, like many of the Bi-County Districts, that have already made the changes to English and social studies credits, will not have to decrease electives, unless they choose to do so for other reasons. (4) The SBE appreciates the Bi-County Superintendents' commitment to quality student learning and reaffirms the Board's commitment not to move forward on any graduation requirements determined by OSPI to have fiscal costs.</p>
11/07/11	Everett	<p>Overall, the Everett Public School Board of Directors is supportive of the proposed changes. Everett Public Schools has a long history of requiring credits in excess of the state's min. credit requirement for high school graduation. Therefore the impacts associated with these proposed changes may be less in Everett than in other school districts in the state. (1) Please note the board's major concern is the projected financial impact of at least one of the changes. No change in state requirements should drive up local costs. This is especially so in the most difficult economic conditions. Washington school districts have faced in decades. We understand the following information to provide the basis for our analysis of how these changes will impact Everett Public Schools. (2) Making satisfactory completion of WA State History and government a noncredit requirement so the course can be offered at the middle or high school level. Districts can still assign credit for high school level courses. In 2006, Everett moved WA State History and Gov from high school to a non-credit middle school requirement. The district continues to offer a high school version of WA State History as a social studies elective. (3) Creating a "2 for 1" policy for CTE-equivalent class, satisfy two grad requirements, and earn one credit. This will free up an elective credit for participating</p>	<p>Everett Public School Board of Directors' overall support for the proposed changes to the state's high school graduation requirements along with its comment that it has historically required credits in excess of the state's minimum making the impacts associated with the changes less than other school districts is noted. Everett currently requires students to earn 22 credits to graduate. (1) Everett's concern about the projected financial impact on local costs is acknowledged. As noted in previous responses, the Legislature directed OSPI in RCW 28A.230.090 to conduct an independent analysis of the impact of any changes to state graduation requirements. OSPI's analysis concluded that an increase of 1 English credit and .5 credits of social studies, along with a 1.5 credit reduction in electives, could be implemented without fiscal cost within the current 20 credit framework. The state's formula for general apportionment funding would require no additional state dollars in order to address these changes, as districts would have sufficient lead time to make staffing adjustments and modify course offerings for the graduation class of 2016. However, in the event a district needs more time and flexibility to implement the changes, the SBE added language to the final version of</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
		<p>students. The ability for a district to grant credit and allow a class to fulfill a second grad requirement will allow students to meet their core graduation requirement's faster while providing increased access to other elective offerings. However, unanticipated impacts could result if students use this option to shift enrollment trends. For example, students taking NJROTC could receive CTE credit and also meet a PE requirement. This could reduce the need for PE sections resulting in a surplus of PE teachers. If the district was unable to reassign surplus teachers to other subjects, principally because of endorsement rules and federal Highly Qualified Teacher reqts, the district would be forced to maintain excess PE staffing at a cost to local taxpayers. This situation would exacerbate staffing constraints resulting from an inability to reduce staff based on reduced program needs. Local taxpayers would be forced to absorb the cost of state mandates. PE staffing patterns represent only one example of impacts that could be experienced in any "cross credited" field. (4) Everett currently requires all students to earn 3.5 credits in high school English. In addition, students are counseled and strongly encouraged to earn at least 4 credits in English to align with the HECB requirement for min entrance to state 4 yr universities. Because of this, 76% of the graduating class of 2010 earned at least 4 credits in English. The SBE changes would impact the remaining 24% of the class (249 students) who only earned 3.5 credits. The result would be 9 additional sections of English needed to be offered in this school district. These additional sections would require 0.9 certificated FTE. With four years of lead time, the district will be able to adjust its staffing patterns to meet this requirement. (5) The District currently requires 2.5 credits in social studies. As with English, all students are counseled and encouraged to earn 3 credits in social studies. The proposed changes will require the remaining 20% of students to earn an additional 0.5 credits. The result would be 7 additional sections of social studies at a staffing allocation of 0.7 FTE. With four years of lead time to</p>	<p>WAC 180-51-067 that authorizes a school district to obtain a 2 year extension for implementation of the increase in English and/or social studies credits required under this rule. (2) Everett School District is correct in its assumption that a district can continue to assign credit for a Washington State History and Government course taken by a student while in high school and for high school level courses taken at a middle school so long as the latter satisfies the requirements set forth in RCW 28A.230.090. (3) SBE confirms that the effect of the "2 for 1" policy for CTE equivalent courses will be to free up an elective credit for participating students. The potential for unintended consequences, such as staffing constraints, of the new policy are noted. (4) Your comment is noted that the Everett School District will be able to adjust its curriculum offerings to provide an additional .5 credit of English for the approximately 24% of its students who currently do not earn 4 credits of English with the four years lead time provided under WAC 180-51-067. (5) Your comment is noted that the district will be able to adjust its curriculum offerings to provide an additional .5 credit of social studies for the approximately 20% of its students who do not currently earn 3 credits of social studies with the four years lead time provided under WAC 180-51-067.</p>

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
		implement this requirement, the district should be able to adjust it's staffing patterns to meet this requirement.	
11/08/11	Whitman County Superintendents (Colton, Oakesdale, Palouse, Rosalia, Tekoa, St.John/Endicott, LaCrosse, Steptoe, Pullman, Colfax, Garfield, Washtucna)	As we look toward the special leg session, and imminent fiscal cuts, the Whitman County Supt's, representing 13 districts in Eastern Washington, would like to express our thoughts concerning graduation requirements. At a time when our collective districts are expected to do more with less, we feel that this is not the time to implement additional requirements that will only increase our fiscal costs. We believe that all our students deserve to graduate with college ready transcripts and certainly with the capability of making a positive impact in the work force. However, the implementation of new requirements, without adequate funding, further hampers our ability to reach our current goals and objectives. These new requirement's would be another set of "unfunded mandates" that will further impede our ability to provide the greatest education possible to the students of our communities. High standards and expectations are the cornerstones of all of our schools. However, it's becoming more and more difficult to maintain high standards and expectations with less than adequate funding. We respectfully ask that you consider the fiscal impact that these new requirements will undoubtedly have on all of the Washington school districts. Further, please understand that each of our districts already maintain high standards and graduate students prepared for college and the workforce. By implementing these new requirement's, the integrity and quality of existing and new programs will be compromised, preventing districts around the state from graduating students prepared for their futures.	The SBE acknowledges that each of the 13 Whitman County districts maintains high standards for students. The Board values input from all school districts, regardless of how the new credit requirements may impact them individually. The Board recognizes that all but two of the districts with high schools represented by the Whitman County superintendents have already made the English and social studies changes contained in WAC 180-51-067. Your opposition to SBE's adoption of the changes to the state's graduation requirements in WAC 180-51-067 at this time is noted. The Legislature directed OSPI in RCW 28A.230.090 to conduct an independent analysis of the impact of any changes to state graduation requirements. OSPI's analysis concluded that an increase of 1 English credit and .5 credits of social studies, along with a 1.5 credit reduction in electives, could be implemented without fiscal cost within the current 20 credit framework. The state's formula for general apportionment funding would require no additional state dollars in order to address these changes, as districts would have sufficient lead time to make staffing adjustments and modify course offerings for the graduation class of 2016. However, in the event a district needs more time and flexibility to implement the changes, the SBE added language to the final version of WAC 180-51-067 that authorizes a school district to obtain a 2 year extension for implementation of the increase in English and/or Social studies credits required under this rule. The changes to the graduation requirements are intended to insure that all students are prepared to receive instruction in core subject areas that will prepare them for postsecondary education, gainful employment and citizenship. This appears to be consistent with the expectations of the Whitman County Superintendents. By increasing the credit requirements for English and social studies, the Board intends to help students

Appendix B – Comments from Washington State School Districts Regarding WAC 180-51-067

Date	School District	Synopsis of Comment	Response
			<p>meet this objective and bring the state’s credit requirements in line with those in the other states that have established high school graduation requirements. The Board recognizes that statewide, among the 247 districts with high schools, 28 districts will need to add .5 credits of social studies, 32 Districts will need to add .5 to 1 credit of English and 12 districts will need to add both English and social studies credits.</p>