



## Strategic Plan Priority | System Design

Goal: School and district structures and systems adapt to meet the evolving needs of the student population and community as a whole. Students are prepared to adapt as needed to fully participate in the world beyond the classroom.

### Waivers of Credit-Based Graduation Requirements and Implementation of SSB 6521 Innovative Learning Pilot Program

PREPARED FOR THE MAY 2020 BOARD MEETING

#### Business Item

#### Materials included in packet:

- Applications and resolutions will be emailed to the Board due to challenges with ADA accessibility of external documents.
  - Swiftwater Learning Center in Cle Elum-Roslyn School District (Final resolution will be forwarded after local board action on May, 11).
  - Innovation Lab High School in Northshore School District
  - Cascade Midway Academy Charter School in the city of Des Moines (*information only*)

#### Synopsis:

In April 1999, the SBE adopted WAC 180-18-055, titled "Alternative high school graduation requirements." The rule authorizes the granting of a waiver by the Board that would enable students to earn a diploma by a demonstration of competencies in core subjects meeting state standards, in place of earning the credits required by Chapter 180-51 WAC (High school graduation requirements).

In filing the adopted rule, WSR 99-10-094, the Board stated that the purpose was to provide school districts and high schools a waiver option from credit-based graduation requirements to support performance-based education.

WAC 180-18-055(1) declares:

"The state board of education finds that current credit-based graduation requirements may be a limitation upon the ability of high schools and districts to make the transition from a time and credit-based education system to a standards and performance-based system with the least amount of difficulty. Therefore, the state board will provide districts and high schools the opportunity to create and implement alternative graduation requirements."

WAC 180-18-055 provides that a school district, or a high school with permission of the district's board of directors, or an approved private school, may apply to the SBE for a waiver of one or more

of the requirements of Chapter 180-51 WAC. The rule is unique among provisions of Chapter 180-18 WAC in authorizing schools, as well as the districts that govern them, to apply for a waiver of basic education requirements, as well as in extending the opportunity to private schools. The SBE may grant the waiver for up to four school years.

The rule lists in detail the information that must be submitted to the SBE with the waiver request. The application must include, for example:

- Specific standards for increased learning that the district or school plans to achieve;
- How the district or school plans to achieve the higher standards, including timelines for implementation;
- How the district or school plans to determine whether the higher standards have been met;
- Evidence that students, families, parents, and citizens were involved in developing the plan; and,
- Evidence that the board of directors, teachers, administrators, and classified employees are committed to working cooperatively in implementing the plan.

The applicant district or school must also provide documentation that the school is (or will be) successful as demonstrated by such indicators as assessment results, graduation rates, college admission rates, follow-up employment data, and student, parent, and public satisfaction and confidence in the school, as evidenced by survey results.

WAC 180-18-055 allows for a waiver of the specific credits enumerated in WAC 180-51. It is not a waiver of learning standards, including grade level expectations, nor is it a waiver of instructional hours. In addition, students still are entitled to a curriculum that meets the minimum requirements for admission to a public four-year college in Washington should they choose that option in their high school and beyond plan (28A.600.160). Any school or district granted a waiver under this section must report annually to the SBE on the progress and effects of implementing the waiver.

Table 1 shows the state learning standards, required high school credits, and the College Academic Distribution Requirements (CADRs) which are minimum requirements to be eligible for admission to a state public baccalaureate institution, and although many schools have additional requirements, the CADRs are generally consistent with minimum expectations for college level work at most public and private colleges and universities. The table below is for illustrative purposes. Content area learning standards are not waived under this waiver authority but high school credit requirements in Chapter 180-51 WAC are waived. High Schools may need to show credit equivalencies for colleges and universities to recognize the CADR credit or other admission requirements.

<b>Content Area Learning Standards</b>	<b>High School Graduation Requirements</b>	<b>College Academic Distribution Requirements (CADRs)</b>
<a href="#">The Arts</a>	1-2 (depends on HSBP choice)	1
<a href="#">Computer Science</a>	Optional	can meet Math or Sr. Year Quantitative
<a href="#">English Language Arts</a>	4	4
<a href="#">English Language Proficiency</a>	English Language Proficiency	n/a
<a href="#">Mathematics</a>	3	3 - Alg. 2
<a href="#">Science</a>	3 for class of 2019 (districts with a waiver may require only 2 credits for class of 2019 and 2020)	3
<a href="#">Social Studies</a>	3 (Including Civics and WA State History)	3
<a href="#">Educational Technology</a>	Must be offered, not required for graduation	n/a
<a href="#">Health and Physical Education</a>	2	n/a
<a href="#">Integrated Environment and Sustainability</a>	May be addressed in Science or other Subject	n/a
<a href="#">World Languages</a>	0-2 (depends on HSBP choice)	2
<a href="#">Financial Education</a>	Must be offered, not required for graduation	n/a
<a href="#">Career and Technical Education</a>	1	n/a

WAC 180-18-055 includes no specific criteria for evaluation of a request for a waiver of credit-based graduation requirements. The rule does stipulate that the SBE may not grant the waiver unless the district or school shows that the proposed non-credit based graduation requirements meet minimum college core admission standards.

All of the schools that have received this waiver to date incorporate aspects of the “Big Picture Learning” model. Big Picture Learning is a Providence, R.I.-based nonprofit, founded in 1995, that supports the creation and operation of public schools that follow its model of personalized, competency-based learning. There are over 70 Big Picture network schools in the U.S. and more around the world.

## Relationship of Waiver to Pilot Learning Program Established by SSB 6521

SSB 6521 (Laws of 2020) creates an OSPI-administered pilot program that would allow a funding flexibility for the schools that receive the credit-based waiver from graduation requirements. Simply put, the pilot program adds some reporting requirements and guardrails to allow districts to claim the traditional Basic Education funding rate rather than the Alternative Learning Experience funding

rate which may be lower. OSPI and SBE staff have collaborated to align the pilot learning program and the credit-based graduation requirements waiver program. In order to qualify for the pilot learning program pursuant to SSB 6521, a SBE-administered waiver from credit-based graduation requirements for the 2019-2020 school year is necessary. Thus, the applicants were advised of this requirement to participate in the pilot program. All of the applicants expressed interest in participating in the pilot program. The applicants were notified that, if applying for the current 2019-2020, they need to explain how they are implementing the waiver plan during the 2019-2020 school year and were encouraged to engage in online professional development during the COVID-19 closure to support the waiver plan.

All three applicants provided the necessary materials. However, as described below, Midway Charter Academy was considered ineligible for consideration by the Board because the underlying waiver authority applies specifically to “school districts” rather than “school or school districts” or “local education agencies.”

These applicants share a focus with current waiver districts on experiential learning through internships and student-led projects that are co-created with educators. Unlike the current waiver recipients, this set of waiver applicants is more focused on flexibilities that allow for re-conceptualizing progress to graduation requirements rather than flexibilities from using numerical credit units to demonstrate student learning on a transcript. The requested flexibilities do fit within the description of the waiver program in WAC 180-18-055 that allows for a broad range of potential flexibilities from the graduation requirements Chapter 180-51 WAC. However, the current waiver recipients are notable for not using numerical credit units to demonstrate how a student met the graduation requirements and the College Academic Distribution Requirements. In contrast, these applicants plan to use credit units to demonstrate student progress on a transcript, at least in the near future, but seek flexibility on how they consider progress towards earning the credit unit requirements. Swiftwater has a plan to transition to no longer using credit units during the 2020-2021 school year but the Innovation Lab and Cascade Midway Academy plan to continue using numerical credit units. Thus, this is a distinctive new set of waiver recipients that are taking a different approach to how they notate student progress.

## Swiftwater Learning Center in Cle Elum-Roslyn School District

Cle Elum-Roslyn School District requests a waiver from credit-based graduation requirements for Swiftwater Learning Center in Cle Elum for the 2019-2023 school years. Swiftwater has been operating as an alternative school and is converting to a Big Picture Learning model school. Cle Elum-Roslyn School District has already begun implementation of the Big Picture Learning model. Swiftwater Learning Center plans to use numerical credit units on student transcripts for the 2019-2020 school year and will no longer use numerical credit unit graduation requirements for the 2020-2021 school year. They report noticeable improvements in attendance, self-confidence, and mastery

of learning standards since implementing aspects of the Big Picture Learning model. The Superintendent's cover letter for the application voices excitement for hands-on learning and community involvement using the waiver flexibilities to further implement the Big Picture Learning model.

The district describes its focus on "Learning Through Internships" and student-envisioned projects developed in concert with educators. Similarly to other Big Picture Learning schools that have received the waiver from credit-based graduation requirements, Swiftwater Learning Center focuses on its participation rate and engagement in experiential learning outside of the traditional classroom. The concept is to provide students with a broader range of internship and project options than just experiences at work sites or course-based projects that are co-created with educators. Swiftwater Learning Center aims to serve students who have credit deficiencies and students at risk of dropping out by using self-paced coursework.

The school provides examples of its proposed transcript and describes the system for measuring student progress. The school states that it will use the OSPI school improvement plan process), graduation rate, Smarter Balanced, Washington Comprehensive Assessment of Science, Armed Services Vocational Aptitude Battery, enrollment, attendance, discipline, and engagement data to measure progress in implementing the waiver plan. The district utilizes the Center for Educational Effectiveness survey of students, staff, and parents to better understand the level of engagement at the school.

The district notes the importance of student and family engagement and that it engaged the community in development of the waiver plan.

Swiftwater Learning Center has begun implementation of the Big Picture Learning model and the school's vision shares commonalities with other Big Picture Learning Schools. Notable aspects of the Big Picture Learning model include the following:

- Use of the five Big Picture Learning competencies:
  - Personal Qualities – "the goal is to be the best you can be - to demonstrate respect, responsibility, organization, leadership, and to reflect on your abilities and strive for improvement."
  - Communication – "the goal is to be a great communicator: to understand your audience, to write, to read, to speak and listen well, to use technology and artistic expression to communicate, and to be exposed to another language(s)."
  - Quantitative Reasoning– "the goal is to think like a mathematician: to appreciate relationships and patterns in numbers, to analyze uncertainty, to comprehend the properties of shapes and graphs, and to study change over time."
  - Empirical Reasoning – "the goal is to think like a scientist or engineer: to use empirical evidence, numerical or qualitative data from your own or others'

observations, and logical processes to make decisions, evaluate hypotheses, and develop informed conclusions. It need not reflect specific scientific content, but may also incorporate ideas from a range of disciplines within the four major branches of science: Mathematics/Logic (including Computer Science), Biological, Physical, and/or Social Sciences.”

- Social Reasoning – “The goal is to think like a social scientist, historian, or anthropologist and to apply an understanding of social and historical patterns to thinking about current political, social, ethical, economic, and cultural issues.”
- Other notable aspects of the Big Picture Learning model include:
  - Intentional use of internships and/or work experience;
  - Individualized learning at the student’s pace and based on the student’s interests;
  - Advisory, which is often mixed grade levels, with a focus on parent engagement;
  - Focus on student-chosen projects and exhibitions; and
  - Use of an array of assessment tools, including but not limited to state assessments.

## Innovation Lab High School in Northshore School District

Northshore School District requests a waiver from credit-based graduation requirements Innovation Lab in Northshore School District for the 2019-2023 school years. Although the school does not open to students until the 2020-2021 school year, the school made use of the 2019-2020 school year as a planning year without students. The principal and other staff members are setting up a new learning environment for future students.

This school is the first applicant for the waiver program that will not be using the Big Picture Learning model. The school emphasizes the importance of experiential learning and re-conceptualizing how graduation requirements are met. Innovation Learning Lab has been participating in the Mastery Transcript Consortium. They have been exploring innovative ways to achieve, measure, and demonstrate student learning. Essentially, their approach is “micro-crediting,” to track progress on specific elements of the learning standards, thus allowing students engaged in interdisciplinary coursework to accrue small amounts of credit in multiple content areas. This conceptualization of credit could allow staff and students to think of their coursework as cross-cutting, interdisciplinary learning rather than as compartmentalized subject areas.

The school notes that it is following the Mastery-Based Learning Workgroup and is seeking to provide mastery-based learning through interdisciplinary studies. Educators will support students in class-based coursework as well as “expeditions” or student-led projects. The school will organize teams of cross-curricular educators to best support interdisciplinary learning in student expeditions. Dr. Tony Wagner, a Harvard Innovation Lab expert, is cited as a source of networking to develop the school’s learning environment and a partner in developing this school’s educational program.

Innovation Lab is adopting the EL model that resulted from a collaboration among Harvard and the Outward Bound program. The model is used throughout the nation.

The EL model focuses on the following three dimensions of student achievement and subsets of those three dimensions:

- Mastery of Knowledge and Skills
  - Demonstrate proficiency and deeper understanding
  - Apply their learning
  - Think critically
  - Communicate clearly
- Character
  - Work to become effective learners
  - Work to become ethical people
  - Contribute to a better world
- High-Quality Student Work
  - Create complex work
  - Demonstrate craftsmanship
  - Create authentic work

[More information can be found regarding the EL model at the EL website.](#)

The school notes that its goal is all students graduating and continuing on to postsecondary education and training opportunities.

The school is working with Dr. Wagner to develop a rubric focused on “the four C’s”: Communication, Collaboration, Critical thinking, and Creativity. Their use of a mastery transcript will focus on providing a portfolio of evidence of mastery that has been continuously built by the student throughout their high school education. They are attempting to have this portfolio be a living document rather than something that students just develop at the end of high school when they apply for scholarships or college admission. Northshore school district uses the [College and Work Readiness Assessment](#), an external assessment developed to measure the four C’s. In addition to typical measures available to Washington schools, the school notes the following methods to evaluate and promote student learning:

- Learning targets
- Checking for understanding during daily lesson
- Using data with students
- Models, critique, and descriptive feedback
- Student-led conferences
- Celebrations of learning
- Standards-based grading

The school describes its outreach to the community including a group of administrators, teachers, students, and community members that were called the “Goal 4 Think Tank” that was a book and discussion group. They focused on the vision and planning for the school and the application notes buy-in to open as a choice school in the Northshore School District.

In response to a question regarding transcripts, the school will not use grades or GPA on the transcript but will use a mastery transcript to demonstrate that they have met admission requirements including College Academic Distribution Requirements. The school will first open to 9<sup>th</sup> and 10<sup>th</sup> graders then add grades during the upcoming years. The school notes that the additional time before students are graduated will allow another few years for the Mastery Transcript Consortium to garner further acceptance among receiving higher education institutions.

## Cascade Midway Academy Charter School in the city of Des Moines

Cascade Midway Academy charter school in Des Moines applied for the waiver from credit-based graduation requirements for the 2019-2023 school years. Cascade Midway Academy is alike Innovation Lab in using the 2019-2020 school year as a planning year while enrolling students for the 2020-2021 school year when it opens as a charter authorized by the Charter School Commission. However, SBE staff determined that a charter school is ineligible for this waiver under current law due to specific references to waiver authority for “school districts” that were neither inclusive of other local education agencies such as charter schools nor used “school or school district” as found elsewhere in statute. Staff have notified the school of the decision not to proceed with the application. A copy of the application is being provided to board members to express the charter school’s interest in this flexibility, how they would make use of the waiver, and to show the charter school’s unique approach to requesting flexibility from how graduation requirements are conceptualized while sticking with using numerical credit units to demonstrate student learning.

### **Business Items:**

- Approval of waiver from credit-based graduation requirements for Swift water Learning Center in Cle Elum-Roslyn School District for the 2019-2023 school years
- Approval of waiver from credit-based graduation requirements for Innovation Lab High School in Northshore School District for the 2019-2023 school years





# The Washington State Board of Education

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

May 1, 2020

Garth Reeves, Chief Academic Officer  
Cascade Midway Academy  
22419 Pacific Hwy. S., #3  
Des Moines, WA 98198

Dear Mr. Reeves,

Thank you for reaching out to the State Board of Education to request a waiver from the credit-based graduation requirements. Based on your request, staff reexamined previous interpretations and guidance regarding the applicability of this waiver for charter public schools. The conclusion of that review is that the use of "school district" in the current rules and underlying statutes applicable to this waiver authority cannot be interpreted more broadly to bring in other organizational governance structures. Staff did not find a definition of school district in the applicable laws that was broad enough to allow State Board of Education staff to consider a charter school equivalent to a school district when interpreting the laws that allow for the waiver program. Therefore, State Board of Education staff determined that the charter school is not eligible to be considered for approval by the Board.

During our review we also considered the question of whether the existing flexibilities afforded to charter schools pursuant to chapter 28A.710 RCW may provide charter public schools the type of flexibility you may require to accomplish the goals outlined in your waiver application. However, that interpretation is beyond the scope of the State Board's role.

As I know you are already aware there is a great deal of flexibility at the local level in determining how the graduation requirements and related learning standards are met and we're happy to explore some ideas with you and the commission to meet your goals within that existing flexibility.

Best regards,

Randy Spaulding  
Executive Director  
State Board of Education

Cc: Joshua Halsey, Executive Director, Charter Schools Commission  
Scott Canfield, Chief Executive Office, Cascade Midway Academy  
Parker Teed, Basic Education Manager, State Board of Education