

September 6, 2019

Washington State Board of Education
c/o Randy Spaulding, Executive Director
600 Washington Street SE
P.O. Box 47206
Olympia, WA 98504

Dear Members and Staff of the State Board of Education,

Subject: Draft Rules for Graduation Pathways Options

The purpose of this letter is to identify concerns of the Washington Roundtable/Partnership for Learning, Black Education Strategy Roundtable, Stand for Children Washington, and Treehouse regarding the board's draft rules for Graduation Pathway Options following the legislative adoption of House Bill 1599 (2019) and to make recommendations for changes to the draft rules prior to the board's final adoption of Washington Administrative Code (WAC). Our organizations' concerns and recommendations are specific to the following Graduation Pathway Options: Dual Credit, Armed Services Vocational Aptitude Battery, and the Career and Technical Education Course Sequence.

Dual Credit

The board's draft rules for dual credit state that students must "[e]arn at least one high school credit in English language arts and at least one high school credit in mathematics in dual credit courses" to achieve this pathway. The board focuses its policy upon the passage of dual credit courses and the earning of high school credit rather than the earning of college credit. Our reading and understanding of the intent and letter of the statute pertains to the award of college credit earned in dual credit courses rather than simply the earning of high school credit in dual credit courses. The statute reads that students must "[c]omplete and qualify for college credit in dual credit courses in English language arts and mathematics." There is no reference whatsoever in the statute regarding the ability to simply earn high school credit to achieve this pathway.

Furthermore, only colleges and universities have the authority to determine what courses qualify for college or university credit. Local school districts nor high schools have such authority. Colleges and universities demonstrate evidence of this qualification by the awarding of such credit and providing students with transcripts specifying this award. Students, therefore, may meet the dual credit pathway option upon the award of college credit by a college or university. That is the intent and letter of the statute. Without the evidence of the award of college credit as offered through an official transcript from a college or university, the student would not be able to demonstrate the criteria required to meet this graduation pathway option. In other words, the ability of local school districts or high schools to determine what qualifies for college credit would be arbitrary.

Finally, concerns have been raised regarding the potential inability or unwillingness of students to pay tuition and/or fees to be awarded college credit via this option. With the passage of House

Bill 1973 (Washington Dual Enrollment Scholarship Pilot Program), students who qualify for free and reduced-price lunch (FRPL) are awarded scholarships to cover the expenses of their enrollment in dual credit courses and the award of college credit. In other words, students from low-income backgrounds will have no costs associated with the completion of this dual credit pathway. Students who do not qualify for FRPL have the means to meet the often-minimal costs associated with the awarding of college credit in dual credit courses such as Running Start and College in the High School.

Our organizations recommend that the board comply with the intent and letter of the statute to require that students be awarded college credit in English language arts and/or mathematics in dual credit courses as demonstrated by evidence of a college or university transcript in order to achieve this graduation pathway option.

Armed Services Vocational Aptitude Battery

The board's draft rules state that students may achieve the Armed Services Vocational Aptitude Battery (ASVAB) pathway option "by scoring at least the minimum established by the military for eligibility to serve in a branch of the armed services at the time that the student takes the assessment." The form and function of the draft rules means that students may achieve this pathway by meeting a minimum score on the Army battery, which is the lowest score of all armed services branches. Following information received from military leaders and recruiters, we understand that this is a very low academic expectation.

We understand that the language of the statute does not provide clear policy direction and that the board must then make a difficult decision. We further understand that the board considered three options: (1) the lowest branch score (Army), (2) the highest branch score (Coast Guard), and (3) the score aligned with the branch to which the student intends to enlist per the student High School and Beyond Plan. Of these options, we recommend (3) as the most preferable and (1) as the least preferable.

There are multiple arguments against the board's current position to allow students to achieve this graduation pathway option by scoring the lowest of the armed services branch cut scores:

1. The current board position is a very low academic expectation.
2. The current board position would create a very likely unintended consequence of communicating to students that they would be prepared for acceptance into ALL branches simply by meeting standard on the Army battery.
3. The current board position would be the lowest expectation, i.e., easiest to achieve, of all graduation pathway options and would have the very likely unintended consequence of pushing students not interested in military service into this post-high school pathway.
4. Our state has a history of holding students of color (particularly black students), students from low-income backgrounds, and students with disabilities to the lowest academic expectations, thus not preparing them for post-high school success. The current board position would have the very likely unintended consequence of inappropriately pushing these populations of students into military service.

Our organizations recommend that the board require that students meet standard on the battery aligned with the branch to which the student intends to enlist per the student High School and Beyond Plan to achieve this graduation pathway option.

Career and Technical Education Course Sequence

The board's draft rules state that students may achieve the career and technical education (CTE) course sequence pathway through "some CTE exploratory courses." Our reading and understanding of the intent and letter of the statute pertains ONLY to (1) minimum criteria of CTE preparatory courses/programs and (2) the curriculum requirements of specified Core Plus programs. There is no reference whatsoever in the statute regarding the ability of students to meet the minimum criteria through CTE exploratory courses/programs. The statute specifically references RCW 28A.700.030, which is by definition the criteria for preparatory secondary career and technical education programs.

The delineation of exploratory vs. preparatory CTE courses and programs is identified in statute, administrative rule, and OSPI policy and procedures. Per these laws, rules, policies, and procedures, local school districts and skills centers must apply to OSPI for the approval of all CTE courses/programs. To deliver these courses and programs and to receive the CTE funding enhancement provided to support these courses/programs, OSPI must approve the courses and programs. Among other criteria, districts and skills centers must identify whether these courses/programs are exploratory or preparatory when applying for CTE program approval from OSPI. In other words, there are procedures already in place to determine which courses/programs meet the minimum criteria for preparatory CTE programs as defined by RCW 28A.700.030. That procedure culminates in a program approval by OSPI.

The board should not insert itself into policy in which it has no statutory authority. OSPI alone determines which courses/programs are exploratory and which are preparatory. The board cannot make these determinations and should avoid doing so through its rule adoption authority for graduation pathway options.

If local school districts and/or skills centers make an argument that some of their OSPI-approved exploratory courses/programs meet the minimum criteria for preparatory programs, then those districts and/or skills centers should re-submit their applications to OSPI for approval as preparatory programs. Those districts nor skills centers nor the State Board of Education may arbitrarily determine without authority that "some CTE exploratory courses" meet the minimum criteria for preparatory courses/program simply for this graduation pathway option.

Our organizations recommend that the board require that students complete a sequence of CTE courses/programs that meet the minimum criteria of CTE preparatory courses/programs and the curriculum requirements of specified Core Plus programs and that the board refrain from the inclusion of any reference to exploratory courses meeting these criteria in the final WAC.

If you have questions regarding the content of the letter, please feel free to contact Brian Jeffries, Policy Director, Washington Roundtable/Partnership for Learning, at brian@partnership4learning.org or (206) 625-9655.

Sincerely,

Steve Mullin, President
Washington Roundtable/Partnership for Learning

Steve Smith, Executive Director
Black Education Strategy Roundtable

Libuse Binder, Executive Director
Stand for Children Washington

Dawn Rains, Chief Policy & Strategy Officer
Treehouse

CC: Senator Lisa Wellman
Senator Brad Hawkins
Representative Sharon Tomiko Santos
Representative Mike Steele
Representative Monica Stonier
Superintendent of Public Instruction Chris Reykdal