

**Policy 2510: Assuring the Quality of Education: Regulations for Education Programs
 Comment Log
 February 13, 2014 to March 17, 2014**

Action Type
 N: No Response - Negative
 NA: Not Accepted + Positive
 A: Accepted o Neutral

Date	Individual/Organization	Comments	Action/ Type	Rationale
§126-42-5 Program Definition and Design				
02-16	Anthony Carpenter Classroom Teacher, High School Charleston WV	Please add Forensics II as Optional Elective on page 16. Please remove Physics from Electives Required to be Offered or find a way for teachers to get content certified in physics.	N/o	The Physics course is offered through the WV Virtual Schools. The Forensics course is only an elective option.
02-24	Ellen Oderman Coordinator WVDE - OSP Charleston WV	126CSR42 - Glossary	N/o	Addressed in subsequent comment regarding glossary.
02-25	Myla Kreinik school counselor Hamilton Middle School Parkersburg WV	Section 5.3.a= a minimum specific time element should be added to the visual art, general music components- i.e.: 6- 9 weeks per 1 year or 3 years- or some students may NEVER have an art class. Section 5.3.b= PEP- often middle school counselors are not familiar with high school course offerings. This plan must be made with both the middle and the 9th grade transitional counselor from the high school working together with the 8th graders. This would make for a better, more informed plan. High school counselors must utilize this information/form. As it is now- they do not in many cases- whether due to lack of training or administrative restrictions as to time.	N/o	Section 5.3.a - is addressed in guidance document. Section 5.3.b - This a local level decision for districts to make regarding the utilization of counselors.
02-27	Stephen L. Wotring	On page 7 of the policy in the section Developmentally	A/o	Language alignment with WVBE

	<p>Curriculum Director Preston Ciounty Schools Kingwood WV</p>	<p>Appropriate Practices for Physical Health and Wellness, the policy states that "WV Universal PK classrooms are required to offer no less than 60 minutes of daily outdoor activity...." Due to weather considerations throughout our state, do we want a policy that requires at least 60 minutes outdoor? Extreme cold, rain, and/or snow can often prohibit this from being accomplished. This phrase needs changed to state that it is recommended and not required. The 60 minutes of activity should be required and it is recommended to be outside, but not required.</p> <p>Additionally, in Chart III, the policy states that choral and instrumental music will be offered to students in grades 6 - 8. This needs to be more clearly clarified. Does this mean at any time in grades 6 - 8 or does this mean each year in grades 6 - 8?</p>		<p>Policy 2525 states "if weather permitting." It further states "A combination of indoor and outdoor time may be utilized when weather conditions are conducive."</p> <p>Clarified in guidance.</p>
02-27	<p>Kathy Butler Vice Chancellor for Academic Affairs WV Higher Education Policy Commission Charleston WV</p>	<p>(Not sure which box to enter comments for Policy 2510)</p> <p>To reduce ambiguity and to increase clarity of the policy, I would suggest that a statement such as "Undergraduate admission to West Virginia four-year college and universities includes the completion of four (4) distinct mathematics courses." Though two courses such as Math I and Math I lab may be appropriately counted as two courses for graduation, they do not cover two distinctly different bodies of knowledge that would be the expectation of college and university admission requirements.</p> <p>In order to address this in the policy, I suggest that a statement, such as the one suggested above, be referenced by an asterisk in Table 5.4a and Table 5.4b where Math I is noted.</p>	NA/o	<p>This comment has been addressed in the guidance document.</p>

		<p>Thank you for considering this comment as the policy is being revised.</p> <p>Kathy Butler</p>		
02-28	<p>Brian F. Thomas Member Bruceton School LSIC Bruceton Mills WV</p>	<p>On page seven of the draft policy it states "WV Universal Pre-K classrooms are required to offer no less than 60 minutes of daily outdoor activity, and physical activity is provided through an integrated approach....."</p> <p>I believe the word "outdoor" should be approached with additional thought and consideration. To require outdoor activity - regardless of weather conditions - is not an appropriate burden to place on local schools or school personnel. It also places a significant risk to the health of young students. As I write this comment, the local temperature is four degrees below zero. I am sure that you will agree, it would likely not be in the best interest of a member of a Pre-K class to be outside for sixty minutes when the actual temperature is -4 with a wind chill factor of -15. The same can be said for snow, rain, thunderstorms, etc. I would suggest that some modifier be added to provide flexibility to schools to balance the desire for outdoor physical activity with protecting students against adverse weather conditions. To allow the policy to remain in its current form with reference to this section would force schools and faculty to either place student health at risk or foster a policy that cannot be followed.</p>	A/o	<p>Language alignment with WVBE Policy 2525 states "if weather permitting." It further states "A combination of indoor and outdoor time may be utilized when weather conditions are conducive."</p>
02-28	<p>Crystal McLaughlin Prek Teacher Preston County Schools Aurora WV</p>	<p>I am concerned about having to be outside in extreme temperatures or snow that is deeper than the students in my class... Is the 60 minutes of outdoor time required in the winter as well? We currently have 60 minutes of gross motor time in my classroom but it is not outdoors during the winter months.... How will this work?</p>	A/o	<p>Language alignment with WVBE Policy 2525 states "if weather permitting." It further states "A combination of indoor and outdoor time may be utilized when weather conditions are conducive."</p>
02-28	<p>Shelba D. Vincell</p>	<p>We have already scheduled our high school for 2014-</p>	NA/o	

	Counselor Pendleton County High School Franklin WV	2015. If this material effects next year, we should have known in time to plan for implementation. I suggest any changes be effective in 2016 for schools who have completed scheduling.		
03-04	Sabrina Hill English Teacher Tolsia High School Fort Gay WV	<p>Our Board of Education feels that the State Department does not give equal recognition to all forms of post-secondary studies at the high school level. AP courses have a certain kind of value, but so do dual credit classes. I realize that the standard response from the State is that counties may also implement dual credit, but there is only the encouragement and reward for advanced placement.</p> <p>Here is the predicament in our school: We have a successful dual credit English program through Marshall University. A qualified instructor teaches English 101/201 through distance learning. In my twelve years of teaching, I have only known of one student who has not received college credit. Now that policy 2510 is requiring advanced placement courses in all core subject areas, our county wants to remove the dual credit programs simply because it appears that the Policy only promotes AP. Our small school cannot support both, and so our county is making a choice--not based on what is best for students, but on what it appears the State Department values most.</p> <p>The dual credit English classes are just like college courses, allowing students to experience the rigor of collegiate academics in the safety of their home schools. This has allowed many to discover just how capable they are--which is the encouragement they need to pursue post-secondary academics.</p> <p>I don't need to remind you of the failure rate on the AP exam. For teachers who have a class size of twenty or</p>	NA/-	Dual Credit policy is developed and implemented at the local district level.

		<p>more, only a fraction score a 3, which gives them only partial credit.</p> <p>It just does not make good sense to remove a thriving program.</p> <p>Please reconsider your position on the superiority of AP over dual credit. In reality, there is no comparison.</p> <p>Thank you for your time.</p> <p>**Our Director of High Schools says that schools only receive recognition on the county report card for AP courses, not dual credit. I hope that, in the future, the State will give equal weight to other types of courses so that counties will encourage schools to utilize them.</p>		
03-04	<p>Janice Hirst Mrs. Preston County Kingwood WV</p>	<p>5.2.d We have 1 PE teacher for 500+ students with little available space for physical movement within the classroom and school. Many students do not come dressed appropriately to go outdoors. We try to have 30 minutes of supervised play with 15 minutes of the time required walking and the other 15 minutes of active play. This is not always possible during inclement weather. It is unreasonable to expect 60 minutes of outdoor activity for Pre-K due to the reasons previously stated.</p>	A/o	<p>Language alignment with WVBE Policy 2525 states “if weather permitting.” It further states “A combination of indoor and outdoor time may be utilized when weather conditions are conducive.”</p>
03-04	<p>Agnes Knopp Pre-k Teacher Wood County Schools Vienna WV</p>	<p>7.2.d.3 I have been told that pre-k classes will go to 5 days a week instead of the 4 days of student attendance with the fifth day for staff development, parent conferences, and teacher planning time. My class has children for 6 1/2 hours for 4 days. This already exceeds the 14 hours a week. If a 5 day attendance program is instituted, then pre-k teachers will be required to have a daily plan--meaning that someone else (another teacher) would be with my children for 40 minutes. 40 minutes could negatively impact the substantial portion of the</p>	N/o	<p>WVBE Policy 2525 is the appropriate policy to comment on for 5 days a week.</p>

		day requirement on the ECERS-R. The ECERS-R is the evaluation system used by the state on pre-k teachers. In order to get the 2 required face to face conferences with each student's parents will require 4 days per year. I usually use two Fridays in the fall and two in the spring to accomplish this. I would like to keep a 4 day-a week with students attending and the fifth day for the 18 hours of pre-k staff development, required parent conferences, and plan time.		
03-04	Jeanne Piell 5th Grade Kingwood Elementary Kingwood WV	Please reconsider the 30 minutes of Physical activity for not less then 3 days a week. Most schools only have 1 PE instructor. With all other programs being added on to a regular classroom teacher's day, there is no time to do an extra 30 minutes of PE per week without a part of the rest of the curriculum suffering. RECONSIDER: No less the 60 minutes of daily OUTDOOR activity for Pre-K??? The wording needs to change in there to count in the weather factors!	NA/o A/o	Language alignment with WVBE Policy 2525 states "if weather permitting." It further states "A combination of indoor and outdoor time may be utilized when weather conditions are conducive."
03-04	Angela Clemens Pre-K teacher Preston County Board of Education Kingwood WV	WV Universal Pre-K classrooms weather permitting are required to offer no less than 60 minutes of daily outdoor activity.	A/+	Language alignment with WVBE Policy 2525 states "if weather permitting." It further states "A combination of indoor and outdoor time may be utilized when weather conditions are conducive."
03-04	Browning wv	Our students do not receive the required amount of physical education, but we have implemented some programs during recess and after school.	N/+	
03-04	Stephen Wotring Director Preston County Schools Kingwood WV	I know this part is not on comment, but I believe I have discovered an "error." Page 27 of the policy (7.4.f) ".....upon enrolling in a publicly supported kindergarten program and to continue to the 17th DAY". Should that not read the 17th YEAR?	A/+	Error corrected.
03-04	Sherry Poland Teacher	5.2.d - When are alternate programs for the additional PE time supposed to be incorporated??? I think	NA/o	Additional physical activity is not defined as additional PE, but

	Preston County Board of Education Kingwood WV	elementary teachers already have many responsibilities without additional responsibilities being placed upon them. There are not enough hours in the school day already to complete activities on certain days. If additional PE time is needed, then funding should be made available to hire additional teachers so the required minutes can be given.		integrated into to the regular day or as recess to promote physical activity.
03-04	Misty Davis Special Education Teacher Kingwood Elementary School Kingwood WV	Weather needs to be taken into account when discussing physical activity, namely recess. In our county, it is not fit through most of the winter months to allow students to be outside for recess, and our school doesn't have the resources to have all students in the gymnasium for recess times. In addition, requiring pre-K students to have 60 minutes of outdoor activity, should also have a weather consideration, as 3-5 year-old children should not be outside in cold or rainy conditions.	A/o	Language alignment with WVBE Policy 2525 states "if weather permitting." It further states "A combination of indoor and outdoor time may be utilized when weather conditions are conducive."
03-04	Anna Rhodes Teacher Kingwood Elementary School Kingwood WV	Section 5.2.d How are the teachers supposed to do at least 30 minutes of outdoor activity when it is either too cold, too rainy, or too stormy, the children are not dressed appropriately to be outside. Schools that do not have access to a safe, secure, weather-proof area will find this very difficult to accomplish. It would be better for the state to provide funding to hire additional Physical Education instructors to provide each student with at least 30 minutes of daily physical activity. Section 5.2.d Technology If the state is requiring each student to have certain technology instruction, then the state needs to provide funding for every school in the state to have at least one full time Technology Instructor. Each student needs to have access to a computer specialist who has the knowledge and the experience to help these students become knowledgeable in the newest technology and the application of these learned skills. Also, each school needs to have enough computers that are in working condition for the students to practice these skills on.	A/o N/-	Language alignment with WVBE Policy 2525 states "if weather permitting." It further states "A combination of indoor and outdoor time may be utilized when weather conditions are conducive."

03-04	Mae Fulk Teacher Preston County Schools Kingwood WV	<p>Section 5.2.d It is not always possible to have children receiving 60 minutes daily of physical activity due to the lack of available space inside. Outside weather conditions are prohibitive during winter. Low temperatures, freezing rain/snow, students' lack of proper winter gear all make opportunities for outside physical exercise very limited. Students could benefit from having adequate gymnasium facilities and personnel to teach physical education.</p> <p>Section 5.2.d We integrate technology to the best of our ability with the older computers that we have in our school and the lack of available technology personnel to assist with this endeavor. Teachers who are responsible for the instruction of technology education (often the classroom teachers) need to be trained adequately before they can be proficient enough to deliver instruction to the students.</p>	A/o N/-	Language alignment with WVBE Policy 2525 states "if weather permitting." It further states "A combination of indoor and outdoor time may be utilized when weather conditions are conducive."
03-04	Denise Harris Teacher Kingwood Elementary Kingwood wv	Sounds good, but we only have 1 pe teacher for 500 students. It won't work.	N/o	No comment
03-04	Tracey Clarkson teacher Preston Co. Board of Ed. Kingwood WV	<p>5.2.d Early Learning Programs Physical Health</p> <p>While the physical fitness of the children of WV is a great concern, many of WV schools are not designed or staffed to enforce 30 minutes of PE three days or more a week. We only have one PE teacher for over 500 students and one multipurpose room. Our classrooms are too small to have students physically active without risking them getting hurt or damaging school property. When the weather is warm and dry our students go outside for recess. Our students don't come dressed appropriately to go outside on cold or snowy days. Parents have complained when we have had them out on days when they have felt it was too cold.</p>	A/o	Language alignment with WVBE Policy 2525 states "if weather permitting." It further states "A combination of indoor and outdoor time may be utilized when weather conditions are conducive."
03-04	Amy Jones	We don't have the staffing and space to implement some	N/o	

	Teacher Kingwood Elementary Kingwood WV	of these programs.		
03-04	nancy riggins Teacher KES Kingwood WV	Multiple opportunities to engage in movement experiences throughout the instructional day is important. In order to implement this program successfully, I see a need for additional PE teachers to be hired and additional facilities are also needed to meet the needs. Classroom space is limited to implement this. Students do not come dressed for outside activities in our climate. Outside facilities need to be provided for outside activities. We also need to teach hand in hand with these movement experiences nutrition. School lunch programs need to offer opportunities for choice in school lunches. Students should have a choice of vegetables that are prepared in an appealing manner. If only one choice is offered and it is something that a student does not like, a vegetable is not eaten at all that day. We need to work on both issues at the same time in order to have healthier students.	N/o	
03-04	Stacy Cramer First Grade Teacher KES Kingwood WV	In regards to 5.2.d (WV Code 18-2-7a) and the 30 minutes of physical education, I feel that we need additional certified personnel and equipment in order to satisfy this requirement.	NA/o	Additional physical activity is not defined as additional PE, but integrated into to the regular day or as recess to promote physical activity.
03-04	David Pauly Teacher PCSchools-Kingwood El. Kingwood	5.2.d. In an extended cold and snowy time, it is impossible to have vigorous activity with only one gym that is used most all of the day. With the pre-K, rainy and winter weather will not allow moderate or vigorous activity of 60 minutes.	A/o	Language alignment with WVBE Policy 2525 states “if weather permitting.” It further states “A combination of indoor and outdoor time may be utilized when weather conditions are conducive.”
03-04	Christopher Enix Mr. Tolsia High Prichard West	I feel that the current policy devalues Dual Credit courses in favor of AP. I strongly recommend that you give equal weight to both classes. Dual Credit courses, such as English 101 or History 103 are an excellent tool	NA/-	Dual Credit courses are developed and implemented at the local district level.

		for many students in WV.		
03-05	Roger Spry Teacher Wayne County Schools Fort Gay wv	AP Biology If you are serious about the AP program, then you should consider requiring Biology 10 for the AP Biology course. Almost zero students can take an AP Biology course with the required labs in only one year! You would not send a sophomore to College Biology. Please consider changing the OR. Biology 10 should be required for AP Biology.	NA/-	A Biology course is offered to all students. AP® course options are chosen at the local district level.
03-05	Doug Barrett Principal West Chapmanville Elementary Chapmanville WV	Developmentally Appropriate Practices Physical Health and Wellness. When discussing the 30 minutes of recess it states it "should" be provided. I think another word should be used. Maybe the wording.. "All schools are expected..." I think it is so important for students to play and socialize with their peers. I have issues with my staff wanting to take their play time that I am currently trying to work on. Thank you for your time. Doug Barrett, Principal West Chapmanville Elementary dbarrett@access	NA/+	Language alignment with WVBE Policy 2525 states "if weather permitting." It further states "A combination of indoor and outdoor time may be utilized when weather conditions are conducive."
03-07	Vickie Mohnacky Coordinator WV Dept. of Education/Special Programs Charleston WV	I'm sorry I didn't see this change in the Policy 2510 on comment: Previous Policy; 5.5.b.3 "For an eligible gifted student, a four-year education plan is developed during the 8th grade year by an IEP team. The four-year plan replaces the ISTP and includes the honors College Board Advanced Placement (hereinafter AP) and/or International Baccalaureate (hereinafter IB) classes that	A/+	Add 5.4.d.7 For an eligible gifted student, a four-year education plan is developed during the 8 th grade year by an IEP Team. The four-year plan replaces the PEP and includes the honors, College Board Advanced Placement (hereinafter AP) and/or

		<p>must be provided for the student in grades 9-12." This followed 5.5.b.2 "Each student, in consultation with..." Current Policy: 5.3.b.3 (which follows current 5.5.b.2 "Each student, in consultation with..." "When the PEP is finalized using the process described in the above sections, the counselors and/or student advisor finalizes the PEP by securing the signatures of the student and parent and/or guardian. The student and parent and/or guardian are provided a copy of the PEP. The PEP is reviewed annually with the student and his or her parent and/or guardian and is signed and dated during each annual review conference."</p> <p>WV State Code 18-2E-3b provides that students identified as gifted in grades 1-8, will have a "four-year education plan which will designate honors or advanced placement courses and/or offerings appropriate and agreed to by the school, parent and student. The four-year education plan must be reviewed annually and approved by the parent, student and school. Schools shall be required to deliver the individualized education program as stated in the four-year education plan."</p> <p>When Policy 2510 included an Individualized Student Transition Plan (ISTP), schools complained that students previously identified as gifted in grades 1-8 would have two plans in grades 9-12, the four-year education plan and the ISTP). Consequently, language was included (5.3.b.3 above) in previous Policy 2510 that the Four-Year Education Plan would replace the ISTP.</p> <p>In addition to state code, the four-year education plan is also maintained in Policy 2419, Regulations for the Education of Exceptional Students. Therefore, I feel that direction on the option of the four-year education plan replacing or substituting for the PEP as long as the four-year education plan contains all the components of an PEP plus honors and AP courses, would be a viable procedure described in Guidelines rather than changing</p>	<p>International Baccalaureate (hereinafter IB) classes that must be provided for the student in grades 9-12.</p>
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		Policy 2510 at this point. I am at 53223. Thanks!		
03-13	Myla Kreinik Curriculum Team Rep Hamilton Middle School Parkersburg WV	<p>5.3a. Visual arts and music should be designated to a full term per 3 years as in the previous document. These classes have CSO's to teach, and as the document is presently worded, principals have to offer the classes, but students do NOT have to take them. How can we have well rounded students without the Arts? There is a designated time for Health and PE; Music and art are equally important. If Art and Music are not "required" for each student, these teachers may be the 1st to be cut in a school that is reconfiguring or with declining population. The other problem with "offering" a music or art class as opposed to requiring it is that not only do students have the option of not signing up for it but if there is demand, and we start cutting back music and art teachers, then we likely won't be able to meet demand. We are comfortable with band or choir satisfying general music requirements and don't think a band or choir student needs to take multiple years of general music at the expense of other electives.</p> <p>There is the potential permission to start cutting music and art teachers as a result of the new policy language, and we'd be doing our students a huge disservice if we go that route. The words said by Mr. Keating in Dead Poet's Society come to mind "We don't read and write poetry because it's cute. We read and write poetry because we are members of the human race, and the human race is filled with passion. And medicine, law, business, engineering, these are noble pursuits and necessary to sustain life. But poetry, beauty, romance, love, these are what we stay alive for."</p> <p>A culture/beginning language (Spanish or French or whatever is taught in 7th and 8th grade) class should be (will be) offered in 6th grade for 9-18 weeks. This will introduce the students to the foreign language and</p>	N/-	Policy 2510 allows for the school administrator and teachers (leadership team) to make a determination about the length of time required for students at the middle level grades to master content in all areas. This is also addressed in guidance.

		<p>culture taught at the school. It will also allow for language readiness, and assist the foreign language teachers in placing students in the 7th and 8th grade classes. Most countries begin foreign language in 2-4th grades. Why must we start so late?</p> <p>Without sufficient yearly training, the PEP cannot be completed successfully or meaningfully in the 8th grade. Whether lead by the “advisor” or directed by the school counselor, those at the middle level are NOT familiar with electives and choices at the high school level (unless they are all in 1 building). The PEP(Personalized Education Plan) must be directed in conjunction with the high school counselor, the middle school personnel, and the students.</p>		
03-13	Katherine Bush Charleston WV	<p>I am very concerned about the phrasing of the Social Studies Curriculum (Page 13)It seems to read that a student could substitute ANY AP Soc St class for the 9th gr World History, 10th gr US-1914 or the 11th gr Contemporary Studies. That could mean that in 9th gr, you could take AP Human Geo instead of a World History and in 10th gr you could take AP Euro instead of early American History. This does not make sense. The students are tested on specific content that those courses DO NOT ADDRESS. I believe it should read: 9th gr World History OR AP World History, 10th gr US-1914 OR AP US History (which I DO NOT RECOMMEND for a 10th grader - I have taught APUSH for 22 yrs) and then in 11th grade teh Cont America OR IF THEY TOOK APUSH in 10th, THEN AND ONLY THEN could they take an out of sequence elective history.</p> <p>The way this policy is phrased, a student would be able to avoid taking any of core history classes if their school offered AP elective course in history.</p>	N/-	This is addressed in guidance documents.
03-14	D. Hanna	With the proposed course description for Social Studies:	N/-	This is addressed in the guidance

	<p>Teacher Kanawha County Board of Education Charleston WV</p>	<p>1. A student could very well go through high school without ever taking an American History class. 2. How can students be tested on the end-of-year standardized tests and never have had the class. 3. If a test is challenged, example, AP United States History, does this count as a credit?</p> <p>We would be failing our students by not keeping them in core classes. Keep Human Georgraphy, Constitutional Law or European History as example of electives that can be offered to students.</p> <p>The public is already very critical of how much students don't know American History today, anyway. This would only fuel what is being said.</p>		<p>document.</p>
<p>03-17</p>	<p>Stephen Smith Director WVHKFC Charleston WV</p>	<p>It is time to un-tie the hands of teachers who want to make physical activity a priority as an educational tool in the classroom.</p> <p>Physical education and physical activity seems to remain a low priority at the implementation level; following, shall is required in the following instances.</p> <p>Change 'should' to 'shall' to rewrite the following sentence on Page 7 next to 'Physical Education'. - At least 50 percent of class time for physical education shall be spent in moderate to vigorous-intensity physical activity. - By changing this word, this now becomes a rule instead of a recommendation. Physical education and physical activity seems to remain a low priority at the implementation level; following, shall is required in this instance.</p>	<p>A/+</p>	<p>Language changed to will.</p>

		<p>On page 7 next to ‘Physical Education’, alternate programs may be submitted to the WVDE and the Healthy Lifestyle Council. I recommend that there be a specific process in the WVDE that approves and tracks the proposed alternate programs, what the acceptable alternate programs are, and that the alternate programs provide the same amount of time (30 minutes, 3 x per week) and intensity ($\geq 50\%$ time spent in moderate to vigorous intensity physical activity) as non-exempt physical education.</p> <p>Change ‘should’ to ‘shall’ and addition of the intensity requirements to rewrite the following sentence on Page 7 next to ‘Physical Activity.’ – In grades Kindergarten-5, physical activity in the form of recess or informal physical activity shall be provided for no fewer than 30 minutes daily for all students and ≥ 50 percent of this physical activity is spent in moderate to vigorous physical activity.”. – By changing this word, this now becomes a rule instead of a recommendation.</p> <p>Change ‘should’ to ‘shall’ to rewrite the following sentence on Page 10 next to ‘Physical Education.’ – At least 50 percent of class time for physical education shall be spent in moderate to vigorous-intensity physical activity. - By changing this word, this now becomes a rule instead of a recommendation.</p> <p>One page 10 next to ‘Physical Activity’ for Grades 6-8, the following sentence is recommended – “In grades 6-8, physical activity in the form of recess or informal physical activity shall be provided for no fewer than 30 minutes daily for all students and ≥ 50 percent of this physical activity is spent in moderate to vigorous physical activity.”</p>	<p>A/+</p> <p>A/+</p>	<p>Language changed to will.</p> <p>Language changed to will.</p>
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		<p>126-42-11 Program Accountability</p> <p>Add 11.3 to include accountability for physical education and physical activity - Each county shall develop and systematically deploy data systems to monitor policies and behaviors pertaining to physical activity and physical education in the school setting, so as to provide a foundation for policy and program planning, development, implementation, and assessment.</p> <p>126-42-12 County Improvement</p> <p>12.2.b – The School Leadership Team shall have the following responsibilities: Add 12.2. b.9 shall require that County Leadership Teams ensure teachers have ongoing professional development opportunities for the K-8 classroom that would enable them to embrace and promote physical activity across the curriculum.</p>	<p>NA/-</p> <p>NA/-</p>	
03-17	<p>Kelly Jo Drey Sustainability Director Bridgemont CTC Montgomery WV</p>	<p>Because this document is intended as a mandate and not just recommendations for schools, using the word ‘should’ is not an appropriate choice. Physical education and physical activity seems to remain a low priority at the implementation level; following, shall is required in the following instances.</p> <p>Change ‘should’ to ‘shall’ to rewrite the following sentence on Page 7 next to ‘Physical Education’. - At least 50 percent of class time for physical education shall be spent in moderate to vigorous-intensity physical activity. - By changing this word, this now becomes a rule instead of a recommendation. Physical education and physical activity seems to remain a low priority at the implementation level; following, shall is required in this instance.</p>	<p>A/+</p>	<p>Language changed to will.</p>

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03-17	<p>Laura Dice Coordinator KEYS 4 HealthyKids Charleston WV</p>	<p>Because this document is intended as a mandate and not just recommendations for schools, using the word ‘should’ is not an appropriate choice. Physical education and physical activity seems to remain a low priority at the implementation level; following, shall is required in the following instances.</p> <p>Change ‘should’ to ‘shall’ to rewrite the following sentence on Page 7 next to ‘Physical Education’. - At least 50 percent of class time for physical education shall be spent in moderate to vigorous-intensity physical activity. - By changing this word, this now becomes a rule instead of a recommendation. Physical education and physical activity seems to remain a low priority at the implementation level; following, shall is required in</p>	<p>A/+</p>	<p>Language changed to will.</p>

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03-17	<p>Kristen O'Sullivan Harrison Program Coordinator Mercer Co Teen Court ChildLaw Services Princeton Wv</p>	<p>Because this document is intended as a mandate and not just recommendations for schools, using the word ‘should’ is not an appropriate choice. Physical education and physical activity seems to remain a low priority at the implementation level; following, shall is required in the following instances.</p> <p>Change ‘should’ to ‘shall’ to rewrite the following sentence on Page 7 next to ‘Physical Education’. - At least 50 percent of class time for physical education shall be spent in moderate to vigorous-intensity physical activity. - By changing this word, this now becomes a rule instead of a recommendation. Physical education and physical activity seems to remain a low priority at</p>	<p>A/+</p>	<p>Language changed to will.</p>

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03-17	marol coats parent grafton wv	I believe physical activity needs to be required for every student, grade improvement, lower bullying activity and general over health will benefit the county, state and our future.	N/0	
03-17	Jessica Hudson	Because this document is intended as a mandate and not just recommendations for schools, using the word ‘should’ is not an appropriate choice. Physical education and physical activity seems to remain a low priority at the implementation level; following, shall is required in the following instances.		

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03-17	<p>Daniel Doyle M.D. Senior physician New River Health Association Scarbro WV</p>	<p>Exercise is crucial for our children to curb the epidemic of obesity and diabetes that is ravaging our state. I totally understand and support the argument of OCOF that the policy should say "shall" not "should". This needs to happen for our children and our state. Dan Doyle M.D.</p>	A/+	
03-17	<p>Lisa Doyle-Parsons PREP Program Coordinator Children's Home Society of WV Parkersburg WV</p>	<p>Because this document is intended as a mandate and not just recommendations for schools, using the word 'should' is not an appropriate choice. Physical education and physical activity seems to remain a low priority at the implementation level; following, shall is required in the following instances.</p> <p>Change 'should' to 'shall' to rewrite the following sentence on Page 7 next to 'Physical Education'. - At least 50 percent of class time for physical education shall be spent in moderate to vigorous-intensity physical activity. - By changing this word, this now becomes a rule instead of a recommendation. Physical education and physical activity seems to remain a low priority at the implementation level; following, shall is required in this instance.</p> <p>On page 7 next to 'Physical Education', alternate programs may be submitted to the WVDE and the</p>	A/+	Language changed to will.

		<p>Healthy Lifestyle Council. I recommend that there be a specific process in the WVDE that approves and tracks the proposed alternate programs, what the acceptable alternate programs are, and that the alternate programs provide the same amount of time (30 minutes, 3 x per week) and intensity (\geq 50% time spent in moderate to vigorous intensity physical activity) as non-exempt physical education.</p> <p>Change ‘should’ to ‘shall’ and addition of the intensity requirements to rewrite the following sentence on Page 7 next to ‘Physical Activity.’ – In grades Kindergarten-5, physical activity in the form of recess or informal physical activity shall be provided for no fewer than 30 minutes daily for all students and \geq 50 percent of this physical activity is spent in moderate to vigorous physical activity.”. – By changing this word, this now becomes a rule instead of a recommendation.</p> <p>Change ‘should’ to ‘shall’ to rewrite the following sentence on Page 10 next to ‘Physical Education.’ – At least 50 percent of class time for physical education shall be spent in moderate to vigorous-intensity physical activity. - By changing this word, this now becomes a rule instead of a recommendation.</p> <p>One page 10 next to ‘Physical Activity’ for Grades 6-8, the following sentence is recommended – “In grades 6-8, physical activity in the form of recess or informal physical activity shall be provided for no fewer than 30 minutes daily for all students and \geq 50 percent of this physical activity is spent in moderate to vigorous physical activity.”</p> <p>126-42-11 Program Accountability</p>	<p>A/+</p> <p>A/+</p>	<p>Language changed to will.</p> <p>Language changed to will.</p>
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03-17	<p>Joseph Smith ASdjunct Instructor @ colleges Rertired WV educataor; Parkersburg WV</p>	<p>Greeks-"A fit body creates a fit mind"; Jean Piaget- "higher order thinking skills are rooted in the development of fundamental movement skills." The brain was developed to do problem solving while MOVING through a unstable environment for the survival of humans.-Dr. John medina (BRAIN RULERS) So, why is it so difficult to understand children/teens need to be moving and engaged in learning through movement that is natural and needs to occur daily?</p> <p>Because this document is intended as a mandate and not just recommendations for schools, using the word 'should' is not an appropriate choice. Physical education and physical activity seems to remain a low priority at the implementation level; following, shall is required in the following instances.</p>		

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03-17	<p>Angie Fisher Agriculture Teacher Tug Valley High School Williamson WV</p>	<p>Because this document is intended as a mandate and not just recommendations for schools, using the word ‘should’ is not an appropriate choice. Physical education and physical activity seems to remain a low priority at the implementation level; following, shall is required in the following instances.</p> <p>Change ‘should’ to ‘shall’ to rewrite the following sentence on Page 7 next to ‘Physical Education’. - At least 50 percent of class time for physical education shall be spent in moderate to vigorous-intensity physical activity. - By changing this word, this now becomes a rule instead of a recommendation. Physical education and physical activity seems to remain a low priority at the implementation level; following, shall is required in this instance.</p> <p>On page 7 next to ‘Physical Education’, alternate programs may be submitted to the WVDE and the</p>	<p>A/+</p>	<p>Language changed to will.</p>

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03-17	Marcia Daoust Concerned citizen Huntington WV	Please get WV's children moving more. Please change 'should' to 'shall' to rewrite the following sentence on Page 7 next to 'Physical Education'. - At least 50	A/+	

		percent of class time for physical education shall be spent in moderate to vigorous-intensity physical activity. It is essential that children move a lot more during the day than they are currently. Creative teachers can incorporate learning with physical movement. (My teachers did that in the classroom back in the 1950's & 60's, so I know it can be done.) We need to reverse obesity, diabetes, and other health problems afflicting our children. Also, Add 11.3 to include accountability for physical education and physical activity - I believe every county needs to develop and systematically deploy data systems to monitor policies and behaviors relating to physical activity and physical ed in the school setting. There needs to be a foundation for policy and program planning, development, implementation, and assessment. Thank you!		
03-17	Patrick Leggett School Counselor Mason County Schools Point Pleasant West	The Comprehensive School Counseling Program Plan needs to be included within the Five-Year Plan. 7.4.b -SCHOOL COUNSELING PROGRAMSchool counselors shall be full-time professional personnel, shall spend as close to 100% of their time to guidance and counseling in accordance to POLICY 2315 (W.Va. Code 18-5-18b).	N/0 NA/-	Addressed in Policy 2315. Defined in State Code.
03-17	Jacob Green Executive Director West Virginia Department of Education Charleston WV	5.4.h.2 - In addition to accepting our credits, can there be language added to address county school districts accepting OIEP's locally approved programs of study?	NA/o	Due to change in policy language this is no longer necessary. Concentrations are now locally approved by districts.
03-17	Jacob Green Executive Director West Virginia Department of Education Charleston WV	The first requirement for effective implementation of a state statute is communication. In this regard, county school districts have been criticized by circuit court judges and other agency personnel for lack of participation in multi-disciplinary team meetings (MDTs) required under state code (code citations). Statutory language requiring educators to participate in	NA/o	This is a current requirement of State Code, therefore, policy is not required. This issue is beyond the purview of the current comment period.

		these meetings fall under sections of the state code unfamiliar to many education personnel. A recent analysis of State Board of Education policy by the Education of Children in Out-of-Home Care Advisory Committee found policy directives and implementation guidance to implement the MDT statutory obligations were absent. The Advisory Committee is requesting that the State Board include policy directives for MDT implementation in Policy 2510 and that the directives include the obligation that local boards of education develop.		But will be considered in future work.
§126-42-13 Index				
02-24	Ellen Oderman Coordinator WVDE - OSP Charleston WV	13.59 Support for Personalized Learning (SPL) - a multi-tiered system of academic and behavior support which districts and schools can use to ensure every learner is engaged in learning experiences that are relevant to their needs and maximize their growth.	A/+	Definition changed.
02-25	Myla Kreinik school counselor Hamilton Middle School Parkersburg WV	5.3.a:Student Success/Career Readiness- Will all 16 new career clusters be considered for choice when completing a PEP? Some high schools only specify clusters that cover programs they offer instead of all 16 choices. This needs to be specified.	NA/o	The Personalized Education Plan addresses all 16 Career Clusters.
03-17	marol coats parent grafton wv	I am excited the Department of Education recognizes the benefit that activity will have on students. WV deals with weather and working parents, for some students school is the only inside safe place to be active and stretch big muscles. Activity leads to co ordination which is a benefit all through life.	N/o	
03-17	Patrick Leggett School Counselor Mason County Schools Point Pleasant West	12.2.a.2, 2) improvement goals, involving the Comprehensive School Counseling Program's Goals,	N/o	
03-17	Jacob Green Executive Director West Virginia Department of Education	Multidisciplinary team (MDT): A team of individuals with a vested interest in a child’s well—being, treatment and placement which includes representation from the following: Law enforcement; child protective services;	NA/o	Glossary definition is unnecessary, as MDT does not appear in Policy 2510.

	Charleston WV	prosecution; mental health; medical; victim advocacy; child advocacy center; education.		
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