

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

DATE	INDIVIDUAL ORGANIZATION	COMMENTS	ACTION/TYPE	RATIONALE
<b>§126-13-1 General</b>				
04-25	Herchiel Sims Jr Advisory Board Member The Education Alliance Kiawah Island SC	I support the initiative to establish an A-F grading system for schools. And endorse the Recommendations of The Education Alliance.	N/+	
04-30	Seth Underwood	I do not agree with the amount of emphasis placed on test scores in the evaluation of schools and their staffs.	N/-	
05-01	Deborah Bever Director Ritchie County Schools Harrisville WV	In years past, Distinguished school recognition included school wide attendance. I just wondered if attendance for elementary and middle schools had been given consideration in place of graduation rate that is incorporated into the high school rating scale. I truly applaud these changes and can tell that much work and thought have gone into this process for improving education! Thank you!	NA/o	Attendance is not part of the current accountability system.
05-08	Jason McPeak Guidance Counselor Logan County Logan WV	I believe that this policy is setting up schools to fail. I understand that there must be accountability, however, a point system and a letter grade are not the way to go. If you have students who, when they test, simply mark any answer, because they do not care, and when there is no consequences for them whatsoever, then how can schools be held accountable for apathy? Further, how can special education students be tested at the same levels as other students, when they need modifications for their daily work and for the content and objectives. This sets special education students up for failure also. This policy is saying that schools have 1 year to improve or else the principal can be removed. How can a school drastically improve the lowest 25% of students when merely getting them in school is an accomplishment. I believe that every student should be either college or career ready, however, last year the labeling it as "priority, focus, support, transition, or success" but now the very next year they are going to label schools with a letter grade. I understand that education is fluid and change is inevitable but this is ridiculous. How long has it been since a State Department of Education was a teacher in the school system? How many of you have been a teacher in Southern WV where simply getting a student to attend school is a victory in and of itself. This policy will ruin schools and cause overcrowding. Afterall, who wants to attend an F school. Does a school labeling have repercussions with future student athletes? For those who go on to attend college? Could the colleges say that a students courses are not adequate and that it could impact their chances for admission? This could have long and far reaching issues that I do not think have been thought about.	N/-	

05-08 Christy Spry Chapmanville West	As I teacher, I feel this new law aims to bring about accountability, but misses the mark by evaluating teachers to the point of frustration. We are evaluated by our administrators based upon progression of our teaching career in addition to self-evaluation and many other markers that indicate our efficiency. Teachers that are performing to the best of their ability every day feel this is excessive, and it is. The appropriate place for legislation is to bring about laws to protect teachers that are effective based on already established markers and give school boards the right to remove teachers that are not.	N/-
05-09 Dale Lee President (of WVEA) West Virginia Education Association Charleston WV	WVEA does not oppose an accountability system but we do oppose one that involves an A-F rating system. The system proposed in this policy is similar to those initiated by Governor Jeb Bush in Florida and then copied by a number of other states. Many of those states, including Florida, are now looking at doing away with such a punitive system and looking at another to fairly judge their schools.  A-F ratings simply replace our system of accountability with punitive labels like an F. The stigma attached to the ratings is problematic. It does not build morale or public confidence. As one situation in Indiana has shown, the potential for manipulating the A-F system to benefit political allies exists.	N/-
	Also an issue is the factors used in determining the rating. To only use the student performance on academic assessments of mathematics and English/language arts and, where applicable, graduation rates are an unfair measure of what is a true indicator of academic success and an indicator of a high quality school. This presumes that all students learn at the same pace and are all ready to be tested on the material at the same time. Measuring our schools with a one-size-fits-all system is unfair.	N/-
	Students come to our schools from a wide array of homes. Some are even homeless. Yet all are supposed to perform at the same pace and test at the same level. The premise is simply unrealistic and so is using it as the sole indicator of school quality.	N/-
	The other unrealistic component of the policy is the time requirement needed by the employees of our schools to fulfill the requirements of the plan. The WVBE knows time is a problem. Requiring more professional development and more time spent working on school plans is simply unrealistic given the current demands and staffing of our public schools.	N/-
	Simply calling a school deficient and asking the staff to put in more time and do more is not an effective means of school improvement. As a matter of fact that appears to be the model currently being used and it has not proven to be effective. It actually encourages dedicated, hardworking employees to leave the lower performing schools. They find they cannot keep up with the new demands and they can no longer spend the time needed to assist the low-performing students. The new policy makes no mention of the "time factor" and how that issue will be overcome.	N/-
05-12 Kelly Bennett Teacher Logan County Board of Education Logan WV	There are so many other ways of holding schools accountable. Until students are held accountable for THEIR OWN tests....it is not a true reflection on any school or teacher. The kids have no consequences on performing badly on standardized testing.  Teachers, not administrators or legislators should drive the goals and curriculum in this state. Too many at the top have forgotten what it is like to be in the classroom. Things have dramatically changed within the last 5 years in the WV classroom. Throwing more regulations and policies at us is not helping. Law makers are not teachers. It is hendering us and forgetting to look at the child as a whole.  Rather than waste the time, energy and money to make more policies that not truly reflective of WV children, the money should go to	N/-

requiring more art, music and physical activity within each school. This helps kids express and vent their energy and would bring up test scores. Arts develop the brain but are being forgotten. We need it more now than ever!

05-12 Eileen Poling  
County-wide  
teacher of gifted  
Tucker County  
Schools  
Parsons WV

This type of grading system has been used in several other states. It has also created many questions.  
To learn of the circumstances in other states, please read the articles below.  
<http://www.tampabay.com/news/education/k12/florida-education-commissioner-proposes-plan-to-simplify-school-grading/2165149>  
  
[http://www.edweek.org/ew/articles/2014/04/23/29funding.h33.html?utm\\_source=fb&utm\\_medium=rss&utm\\_campaign=mrss&cmp=RSS-FEED](http://www.edweek.org/ew/articles/2014/04/23/29funding.h33.html?utm_source=fb&utm_medium=rss&utm_campaign=mrss&cmp=RSS-FEED)  
  
<http://www.sltrib.com/sltrib/news/57849680-78/schools-system-letter-grades.html.csp>  
  
<http://www.news-press.com/news/>

N/-

05-12 Mike Kelley  
Executive Board  
Member  
WVASSP  
Charleston WV

There seem to be at least two items in the policy that are non-negotiable. I say this because these items stay in despite opposition from many stakeholders. If the BOE is firm on these items, so be it. However, please consider the modifications below.

- 1. A district cannot be fully accredited unless every school is rated as a C or better, or has shown improvement over the past year.

N/-

This is unrealistic and will impact large school districts disproportionately. Even schools that improve greatly do not do so on a perpetual upward plane. There will be periods where scores dip and then rise again. It is highly unlikely that large school districts will ever be fully accredited because there will always be a handful of schools, or one school, that does not improve in any given year. It would seem a percentage, something less than 100%, is fairer when evaluating districts of various sizes.

- 2. Schools and districts will be given a letter grade.

There will be consequences, positive and negative, to assigning letter grades. The BOE will have to evaluate the benefits vs. the damage over time. The only way the BOE can accurately measure is to experience the pluses and minuses in the same manner as everyone else. The BOE, WVDE and OEPA should be assigned a grade for the performance of the state as a whole, based on the same criteria on which the schools and districts are rated. The state data already exists and is reported annually. It is easy to plug it into the scale. Furthermore, the BOE, WVDE and OEPA should be subject to supports and consequences in the event of poor performance.

N/-

The BOE seems to believe in this idea very strongly, it is a great opportunity to lead from the front.

**§126-13-2 Overview**

05-01 Wendy Imperial  
Assistant  
Superintendent  
Harrison County

In order to better reflect school performance I recommend the following wording:

- A=distinctive student proficiency
- B=commendable student proficiency

A/o

Policy language will be changed to reflect

	Schools Clarksburg WV	C=acceptable student proficiency D=low student proficiency F=unacceptable student proficiency		different grade descriptors.
05-01	Joseph groom Principal Gauley Bridge Elementary Gauley Bridge Wv	I personally feel that too much emphasis has been placed on a standardized test. When you talk about one test having an effect on an entire school system, especially a person's job, it's entirely too much. WV has some great teachers, who work extremely hard. Their success should not be measured by how well a student does on a test that most people feel is a waste of time. We spend a lot of time trying to motivate, educate, and prod our kids to do their best only to have their parents tell them that the test is a waste of time. I personally feel that there is a better way to assess our schools. I hope this policy does not pass. It will only punish some hard working people unfairly.	N/-	
05-02	Blaine Hess Superintendent Jackson County Schools Ripley WV	I would suggest that the A-F designations referenced in this section be defined as follows:  A=distinctive student proficiency B=commendable student proficiency C=acceptable student proficiency D=low student proficiency F=unacceptable student proficiency	A/o	Policy language will be changed to reflect different grade descriptors.
05-02	Tracy LeMasters Principal Cottageville Elementary School Cottageville WV	I like the idea of a grading system for the schools and the public, because everyone understands letter grades. I feel a description needs to accompany each grade and I personally like this: A-distinctive student proficiency B-commendable student proficiency C-acceptable student proficiency D-low student proficiency F-unacceptable student proficiency	A/o	Policy language will be changed to reflect different grade descriptors.
05-09	Dale Lee President (of WVEA) West Virginia Education Association Charleston WV	2.2.a-d (and 5.2.d) -- Where is stakeholder involvement when it comes to setting the cut scores? Where is the transparency? There needs to be a standards-setting process that gets direct stakeholder input (from teachers, unions, communities, parents, etc.). When the WVBE decides to reset the bar down the road, there should once again be a standards-setting process that gets direct stakeholder input and includes transparent information about why and how the cut scores are being changed.  2.4.a.2 – The 2014-2015 school year is too soon to implement and train on the new system. It should be delayed until the following year.  2.4.b – Other factors should be involved and not just the student performance on an academic assessment and a rating of something other than A-F.	A/-  NA/-  NA/-	There will be a formal standard setting process which cannot be conducted until the impact data are available.
05-09	Jennifer Hickman Mrs. Kanawha County Schools Cross Lanes WV	The main assessment method for this review is based on the Westest and next year Smarter Balance, without considering any other means of evaluating student knowledge. How is it feasible to judge a school based on one method of testing, without looking at background information considering the school's population and how the students are doing in other areas of assessment; for example, Dibels, Scott Foresman, Acuity, project based learning activities, etc.	N/-	

05-12	Kelly Bennett Teacher Logan County Board of Education Logan wv	The whole accountability is not fair to high schools when we are battling students dropping out to receive social security disability or welfare. Kids have no home lives and westest is not high on the kids priority list. When they have no home and are cold or abused...the test is not important to them. These kids are taught they are just not showing it on the test. The economy is a reflection of what comes through our doors. We are trying our best. The students must be held accountable for something. Not just the staff. We cannot change their home lives.	N/-
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**§126-13-3 Premises and Purposes**

05-09	Dale Lee President (of WVEA) West Virginia Education Association Charleston WV	3.1.a – While teachers do their best to help their students, socioeconomic status often plays a significant role in student achievement.	N/o
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05-09	Jennifer Hickman Mrs. Kanawha County Schools Cross Lanes WV	It is true that all children can learn, but expectations need to reflect their abilities and situations. One must also consider that some children are not consistently brought to school on a regular basis or brought in late, so they are missing pertinent and important instruction. When a child misses necessary skills and does not partake in making up missed assignments, then there will be skill deficits. How is it right to blame a teacher for these skill gaps when a child is not in school. Or think of the poor children who are going to bed hungry or do not know where they will be sleeping from one night to the next, how can you expect them to achieve at the rate of their peers?	N/o
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It is fine to share information about schools, but the grading methods need to be appropriate and fair. Simply placing a grade on a school based on one method of assessment and comparing it to entirely different tests, given once a year, is not a valid approach to assigning a detrimental score to a school that consistently goes the extra mile for its students.

N/o

Every school should focus on the success of its students, but based on student's success, each can look entirely different. If you are a student identified as gifted an aim for earning distinguished on the Westest is incredibly feasible, but if you are a child who truly struggles academically it is not right to place the same expectations on that student. All you would cause would be stress, instead of cheering each individual student on for his/her own strengths and successes.

N/o

05-12	Kelly Bennett Teacher Logan County Board of Education Logan wv	One test does not show a true reflection of a school. There is so much more to life and education rather than testing. The kids say the same. It is hard to think about improving when we as teachers are spread so thin with additional paper work that takes away from instructional time.	N/o
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UNTIL THERE ARE CONSEQUENCES FOR THE STUDENTS, you can not have consequences only for the school.

N/-

We love kids and want them to be all they can be. Being beat down by the state does not help us to achieve the goal of helping these kids. We have to educate every student. We cannot be compared to other nations that do not educate each student. Not all families or kids care about education. We try our hardest.

N/-

**§126-13-4 Glossary**

05-09	Dale Lee President (of WVEA) West Virginia Education Association Charleston WV	4.12 – All the staff work involved in the “continuous improvement;” where is the time? What are you taking away in order to do more?	N/-
		4.21 – Definition of “Full Academic Year” (FAY) should also include attendance requirements and not just enrollment figures. Some students may miss more than half the 135 days and yet the school is responsible for their performance even though they have not been in school.	N/-
		4.26 -- “Observed Growth” is only on the statewide summative assessment instrument. Student growth occurs in other ways and those are not valued.	N/-

05-09	Jennifer Hickman Mrs. Kanawha County Schools Cross Lanes WV	The focus is based so much on the lowest 25% of the school population, that my fear is what is going to happen to the other 75%. This is why we are falling behind of China, the urge to also aid and accelerate our higher students has been forgotten. Every individual child in the school needs to be given appropriate and adequate instruction to the best of that child's and the teacher's abilities. This new proposal is a scare tactic that will make some schools so fearful that they feel no other choice but to give all time and energy to work with a handful of students and disregard the majority of the school's population.	N/-
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This is policy is going to cause a larger rift between community and school. Community support and parental support are already down, which is the biggest problem we have in American educational system. One of the reasons China remains on top is because teachers still hold a place of value and are seen in a respectable and honorable light, but unfortunately, in our country, teachers are one of the lowest paid professions and treated without support.

**§126-13-5 West Virginia Accountability System (WVAS)**

04-25	Amelia Courts President/CEO The Education Alliance Charleston WV	<p>Perhaps more than any other reform, equipping the public with fair and transparent information about the status of their schools has the potential to change the culture of education in West Virginia. It will shine a bright light on quality and that, in itself, promises to create a catalyst for change and promote measurable student benefits. Put even more succinctly, what gets measured gets done.</p> <p>In most states, the process of measuring school performance is part of the state’s accountability and accreditation system. Research has shown that effective accountability systems are designed to incentivize the improvement of all schools and advance the state’s rankings in such national measures as NAEP and ACT. Quality systems annually communicate the level of student performance and school quality in all schools according to that performance in a transparent manner. After years of ambiguous and unclear labels, some states are moving to an A-F grading system for schools. Under the A-F system, every school is expected to demonstrate annual growth and improvement. As a result, parents and community members have a better understanding of schools’ performances as compared to the terminology heretofore used in rating schools. A-rated schools often become a source of pride among parents, students and the community. While schools that earn a D or an F receive additional support that they desperately need.</p> <p>The Education Alliance supports this type of statewide measuring system that allows local boards of education to annually evaluate the growth and improvement of their schools and differentiate supports and resources accordingly to needs.</p> <p>To fully realize the benefits of a transparent A-F school grading system, we recommend the following fundamental principles be infused in the revised accountability system:</p> <ol style="list-style-type: none"> <li>1. Establish fair, rigorous and transparent criteria for all schools in order to annually earn A, B, C, D, or F grades</li> <li>2. Include multiple measures of student learning that are objective and focus on outcomes</li> <li>3. Create a balance of student proficiency status and learning growth measures</li> </ol>	N/+	M
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4. Supports a school climate of meaningful, engaged student learning that discourages “teaching to the test” and rewards accelerated student learning.

5. Engages students, families, businesses, communities in rallying support to focus attention on the learning growth of their students with specific, intensive support given to the lowest performing students, irrespective of race, ethnicity, or socioeconomic status.

04-25 Andy Feeney Charleston WV

I support an A-F grading system. I beleive this type of statewide measuring system will allow local boards of education to annually evaluate the growth and improvement of their schools. This will improve the students development and improve the education experience for all WV students.

N/+

04-26 Carrie Beatty Monongalia County Teacher WVEA

Hello. I am a high school teacher in Monongalia County and the mother of four children who are currently enrolled in Mon County public schools. Policy 2320 concerns me for many reasons.

N/-

First, this policy encourages a greater division between the "haves" and the "have-nots." It is very similar to the problems AYP has created. Schools are localized. Property values and the number of low SES students differs as well as parent involvement, extra-curricular and support classes being offered, and other criteria that sets schools apart from one another. There are stigmas attached to schools who do not make AYP, and by extension those students. I see it every day in the halls of my high school.

This grading system is most especially threatening to those schools in neighborhoods who are in a transitional state. In our county, as in many other counties, we have school districts booming while others either stagnate or regress. Multiple outside factors influence AYP. Students lose instructional days due to environmental dangers as roads are created or buildings are being erected, new principals or new test taking practices, a tragic loss for a community--ALL of these influence our students, ALL are real issues and ALL have temporary negative impacts on our students. By the time those results are publicized, some of those factors have disappeared while the result remains until the following year.

I understand the desire to rank schools and even the need to make sure schools are in fact educating our students. The "measuring sticks" of success should NEVER be limited to just the number of AP courses offered, the level of mastery achieved on a test, or other item that paints a partial picture of what a school has achieved.

Furthermore, this division encourages a magnetized school system. Hopefully unintentionally but never the less true, by labeling the schools as an "A" or "F" school you will be encouraging the wealthy kids who are not dependent upon a bus to get to school to attend the "A" and the low SES students (who are often a minority, and/or have a higher number of IEPs) to attend the "F" schools. This plan is the exact opposite of integration.

We have systems in place that are already set up to allow schools to identify areas of strengths and weaknesses. This new grading system is a waste of money that could be directed to providing resources that actually benefits the students. How do students benefit knowing they attend an "F" school?

Sincerely,  
Carrie Beatty  
Monongalia County Teacher  
WVEA

05-01 Michael Wells Superintendent Pleasants County Schools

A=distinctive student proficiency  
B=commendable student proficiency  
C=acceptable student proficiency  
D=low student proficiency

A/o

Policy language will be changed to reflect

	St. Marys WV	F=unacceptable student proficiency		different grade descriptors.
05-01	Randall Farley Administrative Assistant Marion County Board of Education Fairmont West	A=distinctive student proficiency B=commendable student proficiency C=acceptable student proficiency D=low student proficiency F=unacceptable student proficiency	A/o	Policy language will be changed to reflect different grade descriptors.
05-01	William A. Smith Superintendent Cabell County Public Schools Huntington WV	Consider the following definitions for letter grades  A=distinctive student proficiency B=commendable student proficiency C=acceptable student proficiency D=low student proficiency F=unacceptable student proficiency	A/o	Policy language will be changed to reflect different grade descriptors.
05-01	Doug Lambert Superintendent Pendleton County Schools Franklin WV	I would suggest and ask the following be substituted regarding the description of the School Performance Levels in Section 5.2.d (5.2.d.1 through 5.2.d.5):  A: Distinctive Student Proficiency B: Commendable Student Proficiency C: Acceptable Student Proficiency D: Low Student Proficiency F: Unacceptable Student Proficiency	A/o	Policy language will be changed to reflect different grade descriptors.
05-01	James Patrick Law Dr. Wood County Schools Parkersburg WV	The following grade definitions would be an improvement over the proposed Grade definitions. Thank you.  A=distinctive student proficiency B=commendable student proficiency C=acceptable student proficiency D=low student proficiency F=unacceptable student proficiency	A/o	Policy language will be changed to reflect different grade descriptors.
05-01	Keith A. Butcher Superintendent Fayette County Schools Fayetteville WV	I would like to recommend that the school performance levels be described as:  A = distinctive student proficiency B = commendable student proficiency C = acceptable student proficiency D = low student proficiency F = unacceptable student proficiency	A/o	Policy language will be changed to reflect different grade descriptors.

05-01	Deborah Bever Director Ritchie County Schools Harrisville WV	The School Performance Levels are a celebrated improvement over the current designations. The Letter grade proficiency ratings are going to be easy for personnel and parents to understand, relate to and either celebrate success or seek improvement.	N/+	
05-01	Martha Dean Superintendent Webster County Schools Webster Spgs wv	I would suggest and ask the following be substituted regarding the description of the School Performance Levels in Section 5.2.d (5.2.d.1 through 5.2.d.5):  A: Distinctive Student Proficiency B: Commendable Student Proficiency C: Acceptable Student Proficiency D: Low Student Proficiency F: Unacceptable Student Proficiency	A/o	Policy language will be changed to reflect different grade descriptors.
05-01	Barbara Whitecotton Superintendent Hardy County Schools Moorefield wv	Please replace the present statement in Section 5.2.d (5.2.d.1 through 5.2.d.5) with the following-  A: Distinctive Student Proficiency B: Commendable Student Proficiency C: Acceptable Student Proficiency D: Low Student Proficiency F: Unacceptable Student Proficiency	A/o	Policy language will be changed to reflect different grade descriptors.
05-01	Robin Daquilante Superintendent Tyler County Schools Middlebourne WV	I would suggest and ask the following be substituted regarding the description of the School Performance Levels in Section 5.2.d (5.2.d.1 through 5.2.d.5):  A: Distinctive Student Proficiency B: Commendable Student Proficiency C: Acceptable Student Proficiency D: Low Student Proficiency F: Unacceptable Student Proficiency	A/o	Policy language will be changed to reflect different grade descriptors.
05-01	Michael Hince Superintendent Marshall County Schools Moundsville WV	Policy 2320 School Ratings change of wording  A= distinctive student proficiency B= commendable student proficiency C= acceptable student proficiency D= low student proficiency F= unacceptable student proficiency	A/o	Policy language will be changed to reflect different grade descriptors.
05-02	John Hudson	Please consider adjusting the language regarding the description of the School Performance Levels in Section 5.2.d to the following:	A/o	Policy

	Superintendent Boone County Schools Madison WV	A: Distinctive Student Proficiency B: Commendable Student Proficiency C: Acceptable Student Proficiency D: Low Student Proficiency F: Unacceptable Student Proficiency		language will be changed to reflect different grade descriptors.
05-02	Beverly Kingery Superintendent Nicholas County Schools Summersville WV	I would recommend changing the D and F grading as follows. I feel this would be more clear to parents and the general public. D = low student proficiency F = unacceptable student proficiency	A/o	Policy language will be changed to reflect different grade descriptors.
05-02	C. David Price Assistant Superintendent Raleigh County Schools Beckley WV	Remove the phrase "and growth" for each grade designation description. It would the read: A=Distinctive student proficiency B=commendable student proficiency C=Acceptable student proficiency D=Low student proficiency F=Unacceptable student proficiency	A/o	Policy language will be changed to reflect different grade descriptors.
05-07	Gary L. Price Superintendent Marion County Board of Education Fairmont WV	I would suggest and ask the following be substituted regarding the description of the School Performance Levels in Section 5.2.d (5.2.d.1 through 5.2.d.5): A: Distinctive Student Proficiency B: Commendable Student Proficiency C: Acceptable Student Proficiency D: Low Student Proficiency F: Unacceptable Student Proficiency	A/o	Policy language will be changed to reflect different grade descriptors.
05-08	Jane Lynch Executive Director RESA 8 Martinsburg WV	In the policy for review, 12.5.b1, identifies that RESAs will become members of OEPA teams. This is in conflict with Policy 3233 2.7, in which it states that RESA staff cannot be members of monitoring teams.  I would suggest that the language be clarified to "all teams include .. teachers, principals, and other personnel not specifically precluded by other state policy. My concern is that since RESAs are to provide technical assistance it is in conflict with the working relationship within schools to be the monitor. We need to have frank, in-depth conversation to support identified needs, especially if it is an area for non-compliance on a monitoring visit. Please also consider that we do cross RESA lines and collaborate based on need.	A/o	Policy language will be changed to reflect policy conflict.
05-08	Nick Zervos Ex. Director RESA 6 Wheeling WV	13.5b.1 I recommend that you reconsider utilizing RESA personnel to monitor their own RESA counties because of the natural conflict that exists with RESAs providing technical assistance for school improvement. I do feel strongly that RESAs can provide mock reviews and support to counties in the RESA for becoming compliant with the standards.	A/o	Policy language will be changed to reflect policy conflict.

05-09	Dale Lee President (of WVEA) West Virginia Education Association Charleston WV	5.2.a – 2014-15 is too soon to begin this rating system.  5.2.b.1 – Only math and English/language arts are counted. What does this do to the other courses? What about science or social studies?  5.2.c.1 – Minimum cell size for a subgroup is 10 students across all grades. Very small.  5.2.d – When will cut scores be determined?	N/-	
05-09	Jason Ward Principal Wirt County Middle School Elizabeth WV	In the school grade designations 5.2.d.1 - 5.2.d.5 I would strongly encourage the wording be changed in describing the proficiency and growth of schools when assigning an overall grade. 5.2.d.1 - Leave the same 5.2.d.2 - Change to schools with "commendable" proficiency and growth.... 5.2.d.3 - Change to schools with "acceptable" proficiency and growth.... 5.2.d.4 & 5 - Leave the same	A/o	Policy language has been changed to reflect more accurate labels for grade designations.
05-09	Jennifer Hickman Mrs. Kanawha County Schools Cross Lanes WV	I certainly agree that focus on graduation rates of high school seniors is incredibly important along with academic growth, but everything has to be accomplished in a fair and reasonable manner. The grading scale of the policy needs to be looked at more closely, it really needs a bell curve and still needs to take into account outside factors; for example, this process should have at least a 1 year delay since there are different tests, the students did not receive as many days of instruction this year due to the weather and water crisis, parent negligence needs to also be a factor, etc.	N/-	
05-12	Kelly Bennett Teacher Logan County Board of Education Logan wv	Schools are so much more than numbers. We are dealing with humans everyday. Humans error, they are not numbers. We are in the trenches fighting this battle to educate kids everyday. The system is not fair. We have students that have down styndrome or so other special needs and the parents keep them in school as long as they can to age 21. This counts against us as a school...when we are doing good in these kids lives. Please quit looking at the education system as numbers. Kids are more than just numbers.  Test scores are not an accurate means of showing if a teacher or student is doing their job. There is no accountabililty for the student.	N/-	
05-12	Mike Kelley Executive Board Member WVASSP Charleston WV	A cell of 10 is too low. I understand you are trying to close loopholes in the system. However, basing accountability standards on a sample size that is statistically questionable is very concerning.  1. A district cannot be fully accredited unless every school is rated as a C or better, or has shown improvement over the past year.  This is unrealistic and will impact large school districts disproportionately. Even schools that improve greatly do not do so on a perpetual upward plane. There will be periods where scores dip and then rise again. It is highly unlikely that large school districts will ever be fully accredited because there will always be a handful of schools, or one school, that does not improve in any given year. It would seem a percentage, something less than 100%, is fairer when evaluating districts of various sizes.  2. Schools and districts will be given a letter grade.	N/-  N/-	

There will be consequences, positive and negative, to assigning letter grades. The BOE will have to evaluate the benefits vs. the damage over time. The only way the BOE can accurately measure is to experience the pluses and minuses in the same manner as everyone else. The BOE, WVDE and OEPA should be assigned a grade for the performance of the state as a whole, based on the same criteria on which the schools and districts are rated. The state data already exists and is reported annually. It is easy to plug it into the scale. Furthermore, the BOE, WVDE and OEPA should be subject to supports and consequences in the event of poor performance.

N/-

**§126-13-6 School Accreditation**

04-29 Diana Bailey Treasurer KCEA Charleston Wv	This policy is degrading to teachers and students. The A-F grades would embarrass students who are performing their best but are having difficulty acquiring skills.	N/-
05-01 Don Dellinger Deputy Superintendent Berkeley County Schools Martinsburg WV	The overall accreditation process appears to be positive. I believe that if administered correctly, we can realize school improvement. My only concern is the community stigma that is attached to the A-F ratings. If we are serious about assisting schools to improve, why would we use a system where such negative connotations are attached to letter grades. In many low performing schools, indicators are the result of issues that are outside of what the school can control. In my district, we have a priority school that is doing some wonderful things for their students and community, but significant progress is slowly evolving. To label this school with an F, would be devastating to the school staff and community and paint a false picture of what is truly happening at the school.	N/+
05-09 Dale Lee President (of WVEA) West Virginia Education Association Charleston WV	6.2 – The premise that student outcomes on a statewide assessment are the primary measure of an effective school is just wrong.  6.3.a.3 – Time is a concern.  6.5.b.1-3 – Time  6.4.a-c – Time  6.4.e.1 – Time  6.5.a.1 – Time  6.6.b – Time	N/-
05-09 Jennifer Hickman Mrs. Kanawha County Schools Cross Lanes WV	It almost seems that this policy is set up for schools to fail. The stress level is going to increase for all staff involved in the school system, which will encourage early retirement of highly qualified teachers and more than likely sway young people to either not go into the field of teaching or opt to go out of state.	N/-
05-12 Kelly Bennett Teacher	To many deadlines and stress that take the emphasis off of the kids. It does take from instruction time. The kids feel the stress...believe it or not. WE MUST LOOK AT THE KIDS AS A WHOLE...not just base everything off of one annual test.	N/-

Logan County  
Board of Education  
Logan wv

- 05-12 Mike Kelley Schools and districts will be given a letter grade. N/-  
Executive Board  
Member  
WVASSP  
Charleston WV  
There will be consequences, positive and negative, to assigning letter grades. The BOE will have to evaluate the benefits vs. the damage over time. The only way the BOE can accurately measure is to experience the pluses and minuses in the same manner as everyone else. The BOE, WVDE and OEPA should be assigned a grade for the performance of the state as a whole, based on the same criteria on which the schools and districts are rated. The state data already exists and is reported annually. It is easy to plug it into the scale. Furthermore, the BOE, WVDE and OEPA should be subject to supports and consequences in the event of poor performance.

**§126-13-7 School System Approval**

- 05-09 Jennifer Hickman This section is very threatening and still needs to take into account other forms of assessment and factors that affect learning. Another N/-  
Mrs.  
Kanawha County  
Schools  
Cross Lanes WV  
issue to take into account is the hardship larger counties will face with this policy. Counties like Kanawha are going to have a much greater time, due to the larger size, to earn a higher grade than smaller counties. Consider how unfair this is when you think of schools like George Washington High and Nitro High which are ranked in the top ten high schools of our state.

- 05-12 Kelly Bennett This is not right. The kids are not held accountable. Their test score do not count against them but count against us a school. The N/-  
Teacher  
Logan County  
Board of Education  
Logan wv  
accountablity must be shared with the students. Their scores are held in confidence. So should the scores of the school. Low scores just undermine all that we work for as a team. The students and teachers will be disappointed and think what is the use to try in a bad school. Grades for kids cannot be displayed to the whole world....never should a school.

This is counter productive to school and student AND teacher moral. Education is hard enough. This would like a slap in the face because there are so many variants that we cannot control in the community. Too many parents are against teachers and schools as it is too. Education is not important to many within our region.

- 05-12 Mike Kelley A district cannot be fully accredited unless every school is rated as a C or better, or has shown improvement over the past year. N/-  
Executive Board  
Member  
WVASSP  
Charleston WV  
This is unrealistic and will impact large school districts disproportionately. Even schools that improve greatly do not do so on a perpetual upward plane. There will be periods where scores dip and then rise again. It is highly unlikely that large school districts will ever be fully accredited because there will always be a handful of schools, or one school, that does not improve in any given year. It would seem a percentage, something less than 100%, is fairer when evaluating districts of various sizes.

**§126-13-8 School and School System Supports and Consequences**

- 05-09 Dale Lee 8.2. et.al. – Who provides the resources to increase capacity in struggling schools? How does a county do this without taking existing N/o  
President (of  
WVEA)  
West Virginia  
Education  
funds from the other schools in the county? What happens to a school when they show improvement and the supports are pulled? In Florida nearly all F schools dropped back down when the additional staff and resources were pulled.  
8.2.f.2.C – If a county has to pay the assigned principal it needs to be on the county pay scale and not an amount chosen by the WVBE.

	Association Charleston WV		N/o
05-12	Kelly Bennett Teacher Logan County Board of Education Logan wv	I feel we have no support with children's home lives.  Consequences far outweigh the support.	N/o  N/o

**§126-13-9 Continuous Improvement and Strategic Planning**

05-01	Deborah Bever Director Ritchie County Schools Harrisville WV	The recognition of current school level structures to develop school improvement is also a celebration. It is appreciated that schools who have structures in place like Leadership Teams or Professional Learning Communities are encouraged to continue and build on improvement processes.	N/o
05-09	Dale Lee President (of WVEA) West Virginia Education Association Charleston WV	9.2.a.1 – Time is a concern.  9.2.b.3 – Time  9.3.a – Time  9.3.c – Time  9.3.e.3 – Time	N/o

**§126-13-10 Rewards and Recognition**

05-01	Deborah Bever Director Ritchie County Schools Harrisville WV	Dr. Penix was correct in his admonition that Principals will need to embrace the strengths and weaknesses of all dynamics of the school. We are going to need to be proactive in our approach to teaching Principals that their school "earned" a score rather than OEPA "gave" them a score. We have these conversations with students often, we have these conversations with school personnel seldom!	N/o
05-09	Dale Lee President (of WVEA) West Virginia Education Association Charleston WV	10.1.b.2 – To not include the D and F schools for recognition of their progress when it is made is a slap at them, and helps to undermine progress they've made.	N/o

**§126-13-11 Needs Analysis, Capacity Building, and Efficiencies**

05-09	Dale Lee President (of WVEA) West Virginia Education Association Charleston WV	11.2.et.al – Time is a concern.	N/o
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**§126-13-13 Operation of the OEPA**

05-09	Dale Lee President (of WVEA) West Virginia Education Association Charleston WV	13.3 – Is there an expected shift of WVDE employees to OEPA? Is there an anticipation of an increase in the number of full-time employees working at OEPA?	N/o
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05-12	Kelly Bennett Teacher Logan County Board of Education Logan wv	The things that the state or legislature deems important should be reevaluated. Their policies do not seem to put the kids first. I just want to TEACH. Sad to see so many things changing to worst due to number games. We are not numbers. Policies must look at the whole child. Not just an annual test.	N/-
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05-12	Karen Brunicardi Interim Executive Director RESA V Parkersburg WV	Section 13.5.b1 Review Team Membership This section identifies that RESAs will become members of OEPA teams. This is in conflict with Policy 3233 section 2.7, in which it states that RESA staff cannot be members of monitoring teams. Our role is to provide technical assistance to our own regional schools and to assist in other RESAs when the need to collaborate and share is required for efficiency. Thus, RESA staff should NOT be assigned to monitoring teams.	A/o	Policy language will be changed to reflect policy conflict.
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**§126-13-14 General Appeals Procedure**

05-12	Kelly Bennett Teacher Logan County Board of Education Logan wv	There seems to be no true appeal.  We cannot take these kids home with us. I think that legislators and WVDE members need to look at the home lives and economy to see what we are dealing with. These kids are not just numbers.	N/-
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**§126-13-15 Severability**

05-12	Kelly Bennett Teacher Logan County Board of Education	This number crunch system just lowers morale in low economic status areas. We need to be encouraged. If you compare the numbers with school in poor areas of the state...it will reflect that in the test scores as well. Areas that have are in productive areas and economy is good.. those scores will be better because those parents embrace education.	N/-
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Logan wv

## Gus Penix

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**From:** Carrie Beatty <carriebeatty4@gmail.com>  
**Sent:** Saturday, April 26, 2014 3:36 PM  
**To:** gpenix@access.k12.wv.us  
**Subject:** Comments policy 2320

Hello. I am a high school teacher in Monongalia County and the mother of four children who are currently enrolled in Mon County public schools. Policy 2320 concerns me for many reasons.

First, this policy encourages a greater division between the "haves" and the "have-nots." It is very similar to the problems AYP has created. Schools are localized. Property values and the number of low SES students differs as well as parent involvement, extra-curricular and support classes being offered, and other criteria that sets schools apart from one another. There are stigmas attached to schools who do not make AYP, and by extension those students. I see it every day in the halls of my high school.

This grading system is most especially threatening to those schools in neighborhoods who are in a transitional state. In our county, as in many other counties, we have school districts booming while others either stagnate or regress. Multiple outside factors influence AYP. Students lose instructional days due to environmental dangers as roads are created or buildings are being erected, new principals or new test taking practices, a tragic loss for a community--ALL of these influence our students, ALL are real issues and ALL have temporary negative impacts on our students. By the time those results are publicized, some of those factors have disappeared while the result remains until the following year.

I understand the desire to rank schools and even the need to make sure schools are in fact educating our students. The "measuring sticks" of success should NEVER be limited to just the number of AP courses offered, the level of mastery achieved on a test, or other item that paints a partial picture of what a school has achieved.

Furthermore, this division encourages a magnetized school system. Hopefully unintentionally but never the less true, by labeling the schools as an "A" or "F" school you will be encouraging the wealthy kids who are not dependent upon a bus to get to school to attend the "A" and the low SES students (who are often a minority, and/or have a higher number of IEPs) to attend the "F" schools. This plan is the exact opposite of integration.

We have systems in place that are already set up to allow schools to identify areas of strengths and weaknesses. This new grading system is a waste of money that could be directed to providing resources that actually benefits the students. How do students benefit knowing they attend an "F" school?

Sincerely,  
Carrie Beatty  
Monongalia County Teacher  
WVEA