

Policy 2520.13: Common Core Content Standards for Career and Technical Education in West Virginia Schools

Comment Log

Comment Period: December 12, 2014 through January 12, 2015

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

Date	Individual/Organization	Comments	Action/ Type	Rationale
1-6-2015	Sallie Hamrick/Randolph Technical Center/Health Science Instructor and Parent	<p>126-44M-4 Summary of the Next Generation Content Standards</p> <p>Simulated workplace requires drug testing for students in CTE, but not high school classes.Requires students to be scanned for attendance purposes. Requires a capstone or senior project for all students in CTE, but not high school students. Also requires many volunteer hours(100-200) to complete the program. With all these changes it WILL be easier for students to stay at their local high schools and graduate instead of coming to the Career and Technicsl Centers.</p>	NA/-	<p>Simulated Workplace provides higher rigor while preparing students for a safe and well trained workforce</p> <p>A clarification was made by removing the capstone project terminology from policy and replacing with technical assessment. An assessment is required for students in CTE programs to ensure that students are better prepared for the workforce and to comply with Federal Perkins Guidelines.</p>
1-6-2015	Sallie Hamrick/Randolph Technical Center/Health Science Instructor and Parent	<p>Comments for section 126-44M-5 Severability</p> <p>I strongly object to the requirement of drug testing for CTE and not other students. This is unfair and discrimination. I also strongly disagree that nurses who are also teachers should be forced to drug test their own students and other students in the school to "save money". I refuse to do it. If you want the students to be</p>	NA/-	<p>Drug testing is funded by a grant acquired by the state. Each county develops a policy and determines the procedures. The local policy determines the drug testing facility, agency or school.</p>

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		drug tested, then you should hire an outside company to do so.		
1-6-2015	Sallie Hamrick/Randolph County Technical Center Parent	<p>Comments for section 126-44M-4 Summary of the Next Generation Content Standards</p> <p>As a parent, I believe it is unfair to require drug testing, retinal scans, unpaid work and a capstone project for students in CTE programs. This is discrimination. At the high school, NONE of these things will be required. I feel like my sons are being punished for attending this school.</p>	<p>NA/-</p> <p>NA/-</p> <p>NA/-</p> <p>NA/-</p>	<p>For clarification the words “where applicable for safety” have been added to the simulated workplace protocols for drug testing.</p> <p>There is no requirement for retinal scans. A formal attendance process is being required, the use of time clocks is an acceptable method of collecting the data but is not required.</p> <p>Students are learning skills through on the job training exercises. There is no requirement to pay students to learn.</p> <p>A clarification to the policy was made providing technical assessments as a performance measure and removing the wording capstone project. An assessment is required for students in CTE programs to</p>

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				ensure that students are better prepared for the workforce and to comply with Federal Perkins Guidelines.
1-6-2015	Jackie Gore/Washington High School/Business Teacher	<p>No section specified</p> <p>I have read through the proposed changes to Policy 2520 and am concerned as to how this could be implemented in the environment where I teach - a high school setting with 45-minutes classes of students in grades 9-12 mixed, specifically the simulated workplace protocols.</p>	NA/O	Simulated Workplace is a cultural/environmental change. The protocols provide a framework to deliver instruction. Teachers continue to have flexibility and creativity in their lesson delivery.
1-6-2015	Jackie Gore/Washington High School/Business Teacher	<p>No section specified</p> <p>Also, all of the stakeholders mentioned are from CTE centers, not high schools. Is this policy for grades 9-12?</p>	NA/O	The stakeholders are housed in CTE centers but many of these stakeholders also represent CTE high school programs.
1-8-2015	Christina Waybright/Randolph County Technical Center/Business Education Instructor Teacher	<p>Comments for section 126-44M-1 General</p> <p>In the career cluster Business Management & Administration (BM 1410 Accounting), Microsoft Office Specialist Exam Excel should be included as one of the acceptable exams, as it is the most accounting related software in the Microsoft suite of programs. Additionally, the Microsoft Access exam should be added to the accounting career cluster as it is a database software that can be utilized for the purpose of tracking customers, inventory, fixed assets, and other accounting related business transactions.rnmYou may also want to consider adding those same exams to BM 1430 Business Finance and all 4 of the Microsoft exams to BM 1479</p>	<p>A/O</p> <p>NA/O</p>	<p>Excel should be included as one of the acceptable exams and will be reflected as a change request in policy 2520.13.</p> <p>Course 1413 BCAII includes content that covers the Access Certification and may be used as an acceptable exam.</p> <p>Credentials in the following concentrations are specific to the content and have exams</p>

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		<p>Business Management and General Management and BM 1495 Entrepreneurship, as nearly all job postings in the business management and administration fields list knowledge of the Microsoft Suite as a requirement for employment. Additionally, you may want to consider revising all areas to include future Microsoft exams, not just the 2013 version of the exam, which will be outdated and not offered soon. The wording could say "Microsoft Office Specialist Exam Word 2013 or most recent version".</p>	<p>NA/O</p> <p>NA/O</p>	<p>listed.</p> <p>BM 1430 Business Finance BM 1479 Business Management and General Management BM 1495 Entrepreneurship.</p> <p>The suggestion to revise all future Microsoft exams is a good suggestion and will be considered for a future revision.</p>
1-9-2015	Andrea Voss /PSHS/Teacher	<p>126-44M-1 General</p> <p>A simulated workplace works well with tech centers that can interview and choose students. Tech centers often have the same students for a progression of courses. However, in high schools, instructors cannot interview students for admission to programs, which is required by a simulated workplace. High schools cannot do drug testing. A 15 minute (business) meeting is not reasonable in a 45 minutes period. I have concerns with the following: The ACT WorkKeys is an authentic and advanced learning environment and fits a business simulation which can be used in high schools and is used in businesses today. The ACT WorkKeys does provide consistency to instructional practices and ensures work and career readiness by training students for an actual challenge in the workplace.</p>	<p>NA/O</p> <p>NA/O</p> <p>NA/O</p> <p>NA/O</p>	<p>High schools that have implemented simulated workplace are currently interviewing students and conducting drug testing.</p> <p>There is no 15 minute (business) meeting requirement.</p> <p>A clarification to policy has been made allowing company meetings to occur "daily or weekly".</p> <p>WorkKeys may still be used by schools but is no longer being funded by the WVDE or used as an accountability</p>

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				measure.
1-9-2015	Andrea Voss /PSHS/Teacher	<p>Comments for section 126-44M-2 Purpose</p> <p>The purpose of these comments are to voice my concerns about changes that are a detriment to quality education in the CTE department.</p>	N/O	
1-9-2015	Andrea Voss /PSHS/Teacher	<p>Comments for section 126-44M-4 Summary of the Next Generation Content Standards</p> <p>simulated workplace eliminating ACT WorkKeys</p>	NA/O	WorkKeys may still be used by schools but is no longer being funded by the WVDE or used as an accountability measure.
1-9-2015	Andrea Voss /PSHS/Teacher	<p>Comments for section 126-44M-5 Severability</p> <p>High schools should be exempt from the workplace simulation due to time constraints, student eligibility, and legal issues. ACT WorkKeys is a measureable objective assessment that has a value beyond high school. A portfolio is a subjective assessment that exists only in the realm of the West Virginia public high school.</p>	NA/O NA/O	<p>Simulated workplace provides an instructional delivery system that fits the classroom regardless of the amount of instructional time.</p> <p>Portfolios were recommended from business and industry to better help students for employment.</p>
1-9-2015	Rebecca Wilcox /Parkersburg South High School/ Business Instructor	<p>Comments for section 126-44M-2 Purpose</p> <p>My purpose is to voice my concern for the changes implemented by the CTE staff at the state level without proper notification to those of us who are charged with teaching our students on a daily basis. We were not made aware of changes in WorkKeys testing, EOC exams, or the requirement of a student portfolio until October 2014.</p>	NA/O	Local CTE administrators were properly advised of these changes in July 2014.
1-9-2015	Rebecca Wilcox /Parkersburg South High	<p>Comments for section 126-44M-4 Summary of the Next Generation Content Standards</p>		

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	School/ Business Instructor	Policy 2520.13 includes Simulated Workplace protocols, eliminates the WorkKeys testing and replaces it with student portfolios and capstone projects.	N/O	
1-9-2015	Rebecca Wilcox /Parkersburg South High School/ Business Instructor	<p>Comments for section 126-44M-5 Severability</p> <p>I don't believe that Simulated Workplace can be implemented in a regular high school setting. We are not able to choose our students by interviewing them. We provide some of the few elective courses within our school, and the choice of classes taken is made by the students and their counselors. Our school is reverting to 45 minute periods next school year. We could not afford to set aside one third of the class time for a "meeting" every day. I do not believe that we would legally be able to drug test our students. Technical schools which are set up for students to attend classes for 3 hours per day, all year, are better equipped to handle the Simulated Workplace. We simply are not. Elimination of the WorkKeys testing is troubling. The purpose of replacing it with the student portfolio and capstone project is to provide consistency to instructional practices and protocols. In our county, we have several manufacturing facilities which require the WorkKeys test !</p> <p>prior to employment. Students were given a measurable, objective format when they were required to take the WorkKeys exam. Now, they are compiling a subjective portfolio of work. Unfortunately, our instructors were not made aware of the changes taking</p>	<p>NA/O</p> <p>NA/O</p> <p>NA/O</p> <p>NA/O</p>	<p>High schools that have implemented simulated workplace are currently interviewing students and completing the same process as career tech centers.</p> <p>A clarification to policy has been made allowing company meetings to occur "daily or weekly".</p> <p>For clarification the words "where applicable for safety" have been added to the simulated workplace protocols for drug testing.</p> <p>WorkKeys may still be used by schools but is no longer being funded by the WVDE or used as an accountability measure.</p>

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		<p>place until well into the current school year. This makes it extremely difficult to complete portfolios for students whom we will not see again this year due to the fact that most of our completers do not have a business class next semester.</p>	NA/-	<p>Administrators were made aware of the portfolio process Summer of 2013. Portfolio templates were provided in July 2013.</p>
1-7-2015	<p>Michael N. McCarty American Medical Technologists Legal Counsel</p>	<p>Comments on Proposed Rule American Medical Technologists (AMT) welcomes this opportunity to submit brief comments on the Department's proposed legislative rule, noticed in the December 12, 2014 <i>West Virginia Register</i>, titled Policy 2520.13: "Next Generation Standards for Career and Technical Education in West Virginia Schools" (Title 126, Series 144M).</p> <p>AMT is a national nonprofit certification organization and professional society for allied health personnel including medical assistants, clinical laboratory technologists and technicians, phlebotomists, and related healthcare personnel. At the close of its 2014 fiscal year, AMT had 66,549 member-certificants in good standing nationally, including nearly 46,000 Registered Medical Assistants (RMAs). AMT maintains an active state society in West Virginia.</p> <p>Many allied healthcare professionals who become certified by AMT have received career and technical training at public and private educational institutions, including institutions that would subject to the Department's proposed Policy 2520.13. AMT's comments are focused exclusively on an apparent technical oversight contained in the proposed</p>	A/O	<p>We accept the requested revision to change the name from Medical Assistants to Registered Medical Assistants.</p>

Date	Individual/Organization	Comments	Action/ Type	Rationale
		<p>Performance Measure for WV CTE Concentration HE0715, Allied Health Services.</p> <p>The proposed policy would replace several discipline-specific allied health concentrations with a more generic Allied Health Services concentration, and would revise the Performance Measure as follows:</p> <p>To achieve mastery, students will score 80% or higher on the Global 21 Performance Assessment; level 4 or higher on the Reading for Information, Applied Mathematics and Locating Information, CT WorkKeys® assessments; Student Portfolio and Capstone Project, and, acquire the CPR/BLS Cardiopulmonary Resuscitation/Basic Life Support and Medical Assistant (MA, NCMA, or CMA) (Medical Assistant, National Certified Medical Assistant, Certified Medical Assistant, Emergency Medical Technician-Basic, Certified Nursing Assistant/Registered Nursing Assistant Certified Dental Assistant Registered Dental Assistant Pharmacy Technician Board Certified) credentials [emphasis added].</p> <p>The parenthetical listing of recognized medical assisting credentials includes the generic term "Medical Assistant" along with two specific nationally recognized certifications for medical assistants. The two words "Medical Assistant" do not really refer to any credential at all; the actual names of existing credentials used nationwide are Registered Medical</p>		

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		<p>Assistant, Certified Medical Assistant, and National Certified Medical Assistant. We strongly recommend that the "Registered Medical Assistant" (RMA) certification awarded by AMT should be substituted in place of the generic designation "Medical Assistant." We believe the omission of the RMA credential was inadvertent, as the Registered Medical Assistant is one of the longest-established and most widely respected certifications for medical assistants in the United States. AMT began certifying RMAs in 1972. Since its inception, the RMA certification program -like all of AMT's exam-based certifications -has been fully accredited by the National Commission for Certifying Agencies (NCCA), the accrediting arm of the Institute for Credentialing Excellence.</p> <p>Accordingly, AMT recommends that the proposed Performance Measure for WV CTE Concentration HE0715, Allied Health Services, be amended to state (in part): "...acquire the Cardiopulmonary Resuscitation/Basic Life Support and Medical Assistant (Registered Medical Assistant, National Certified Medical Assistant, Certified Medical Assistant,) credentials."</p> <p>Thank you for the opportunity to comment.</p> <p>Sincerely, Michael N. McCarty <i>AMT Legal Counsel</i> cc: Christopher A. Damon, JD, Executive Director</p>		

Date	Individual/Organization	Comments	Action/ Type	Rationale
		Kimberly A. Chevront, Ph.D., MBA, MT, J Janet Crigler, MT, WVSSAMT President		
1-12-2015	Luois Mynes/Ben Franklin Career Center/Teacher	<p>Comments for section 126-44M-1 General</p> <p>I don't see anything in policy about poor performers in our programs. We can't remove students from our programs that don't want to be in the program. Grades, absences, attitude rnl don't see anything in policy about funding for all the changes that are being required. For me being in the NCCER program can not get funding for a state mandated program</p>	NA/-	<p>The intent of this policy is not to remove students from classes but to provide an environment related to a real world work experience and excite the student about education.</p> <p>NCCER program funding is provided for approved CTE programs.</p>
1-12-2015	Luois Mynes/Ben Franklin Career Center/Teacher	<p>Comments for section 126-44M-2 Purpose</p> <p>Capstone project what is it? Students required to do 3 detailed projects in the Portfolio. How can something be put into a policy that hasn't been defined? Concerning standards for participation in a co-curricular technical student organization. School has elected not to pay for all students to be part of a Student organization such as Skills</p>	NA/O NA/O	<p>Capstone project is an all-encompassing project that allows the student to demonstrate the attainment of technical skills in their respective CTE program.</p> <p>A clarification to the policy was made providing technical assessments as a performance measure and removing the wording capstone project. An assessment is required for students in CTE programs to ensure that students are better prepared for the workforce and to comply with Federal Perkins Guidelines.</p>

Date	Individual/Organization	Comments	Action/ Type	Rationale
			NA/O	Community-based service projects are to be made available for leadership opportunities that are found in student organizations that are offered co-curricular.
1-12-2015	Luois Mynes/Ben Franklin Career Center/Teacher	<p>Comments for section 126-44M-4 Summary of the Next Generation Content Standards</p> <p>Career Ready Practices, have not seen until looking at policy</p> <p>#3 Attend to personal health and financial well-being. As a teacher it is not my responsibility, nor can I control this.</p> <p>#4 Communicate clearly, what is considered a excellent writer and all the other stuff.</p> <p>#10 Plan Education and Career Path, most of my students are here because they are told to do something, most do not plan on making carpentry a career.</p> <p>Simulated workplace Protocols</p> <p>#3 Testing 40% of students, cost to do this, who is going to pay for this. I can't get funding for materials to teach my field.</p> <p>#10 What are /is 5S's Continuous Quality Improvement Principles</p> <p>#11 What is/are Business and Industry Yearly Onsite Evaluations</p> <p>Construction Career Pathway</p> <p>Should NCCER cover the 10 goals for this concentration?</p> <p>What are they considering a construction project?</p> <p>#3 What is meant by Implement Testing And Inspection Procedures</p> <p>#6 What is meant by Manage Relationship with Internal and External Par! ties?</p> <p>#10 Participate in a co-curricular organization</p> <p>AR 1820 Carpentry Concentration</p> <p>To achieve Mastery, 80% or higher on student Portfolio, will students get a certificate if they don't?</p> <p>Complete</p>	<p>NA/-</p> <p>NA/-</p> <p>NA/O</p>	<p>Attend to personal health and financial well-being is a Career Ready Practice that establishes goals for programs and provides a framework for the developmental experiences necessary to becoming career ready.</p> <p>The application process with promote career awareness and present students to programs who chose to be in the program following the personalized education plan rather than being inappropriately placed.</p> <p>Funding to teach CTE programs are provided through Federal Perkins, State Secondary Block and Program Modernization Grants.</p>

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		Core and Level 1 NCCER credentials. Is this the only 2 levels required for NCCER?	NA/O NA/O NA/O NA/O NA/O	5S's is required in many industries that provide a safe and clean work environment by paying details to the areas of: Sort; Straighten; Shine; Standardize; and Sustain. Business and Industry Yearly Onsite Evaluation provides an opportunity for teachers to showcase their students and program to prospective employers. NCCER, The goals are interrelated to the construction pathway goals. A construction project is completed by student to demonstrate the application of skillsets in construction. Manage Relationship with Internal and External Partners means working with administration and advisory committees to develop relationships that support NCCER/Carpentry.

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			NA/O	Community-based service projects are to be made available for leadership opportunities that are found in student organizations that are offered co-curricular.
			NA/O	The awarding of certificates to students who complete concentrations is a decision made at the county level.
			NA/O	Core and Level 1 NCCER credentials are the only levels required.
1-12-2015	D. Mitchell Fincham/Jefferson High School Ag Ed/FFA Advisor	<p>The following are observations and questions I have in reference to Policy/Rule 2520.13!</p> <p>1. I read throughout this document that there will be no cost to the state and the local BOE's. Who is going to pay for the drug tests, time clocks, new technology, etc. required to implement this program?</p> <p>2. If we randomly drug test students and they fail the test, what do we do with those students. Are they not permitted to participate in the class until a later time,</p>	NA/O	<p>1. A grant has been secured to pay for drug testing and time clocks.</p> <p>2. The county developed drug testing policy is followed. Students are not permitted to operate equipment that could hurt</p>

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		<p>removed, etc. If they are removed, is this a FERPA violation?</p> <p>3. Each class is to begin with a 5 to 10 minute company meeting and students must check in each day, is what I understand. This may be well and good for programs with 90 minute classes; however it could prove an issue for others.</p> <p>4. I see this entire program very applicable for Technical Centers, but it seems a difficult item to insert in comprehensive high schools.</p> <p>5. There is mention that students are to participate in technical student organizations. I cannot determine if this a requirement by the language. If it is required who is going to pay dues for those who refuse?</p> <p>6. I observe that there are requirements in some program areas for Certified Pesticide Applicator Credentials! Is this being taught by the classroom teacher or by the WV Dept. of Ag. You need to be certified as an instructor to teach this program, if I am correct.</p> <p>7. When the CTE staff was on site earlier this year in Jefferson County, I was told by some of the evaluators that this program has gone well in all programs to date. I have had conversation with some teachers that</p>	<p>NA/O</p> <p>A/O</p> <p>NA/O</p> <p>NA/O</p> <p>A/O</p> <p>N/O</p>	<p>themselves or anyone else. Students continue to work on classroom based assignments.</p> <p>3. A clarification to policy has been made allowing company meetings to occur “daily or weekly”.</p> <p>4. Simulated workplace provides an instructional delivery system that fits any CTE classroom.</p> <p>5. Student leadership opportunities are found in student organizations that are offered co-curricular.</p> <p>6. The Certified Pesticide Applicator Credential is being removed as a performance measure.</p>

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		<p>it has decreased their enrollment.</p> <p>8. I was also told that all athletes in the state have to undergo random drug testing in every county. I have spoken with athletic directors who say this is not so, that is to cost prohibitive. Which is correct?</p> <p>9. The only group I have been able to determine who undergoes random drug testing are the bus drivers.</p> <p>10. I love CTE! It has been my heart and passion for over 40 years. I have no issues with programs which advance CTE. It is just my concern that we may be initiating a program without totally thinking it through! Thank you for your interest in the students of West Virginia!</p>	<p>N/O</p> <p>N/O</p> <p>N/O</p>	

Sally Finchum

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Tuesday, January 06, 2015 12:56 PM
To: Sally Finchum
Subject: Comment Received for Policy 2520.13 (2015-01-06 12:55:53)

Please save this email in a "Comments Received Online" folder.
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<http://wvde.state.wv.us/r.html?id=a4e129d7f93e319ad13edca65ac2d700>
This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2520.13

#####

Name: Sallie Hamrick
Organization: Randolph Technical Center
Title: Health Science Instructor and Parent
City/State: Norton , WV
Role: Teacher
Posted: 2015-01-06 12:55:53
Posted from IP:

Comments for section 126-44M-4 Summary of the Next Generation Content Standards

Simulated workplace requires drug testing for students in CTE, but not high school classes. Requires students to be scanned for attendance purposes. Requires a capstone or senior project for all students in CTE, but not high school students. Also requires many volunteer hours(100-200) to complete the program. With all these changes it WILL be easier for students to stay at their local high schools and graduate instead of coming to the Career and Technicsl Centers.

Comments for section 126-44M-5 Severability

I strongly object to the requirement of drug testing for CTE and not other students. This is unfair and discrimination. I also strongly disagree that nurses who are also teachers should be forced to drug test their own students and other students in the school to "save money". I refuse to do it. If you want the students to be drug tested, then you should hire an outside company to do so.

Sally Finchum

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Tuesday, January 06, 2015 1:00 PM
To: Sally Finchum
Subject: Comment Received for Policy 2520.13 (2015-01-06 13:00:25)

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Comment Received for Policy 2520.13

#####

Name: Sallie Hamrick
Organization: Randolph Technical Center
Title: Parent
City/State: Norton , WV
Role: Parent-Family
Posted: 2015-01-06 13:00:25
Posted from IP:

Comments for section 126-44M-4 Summary of the Next Generation Content Standards

As a parent, I believe it is unfair to require drug testing, retinal scans, unpaid work and a capstone project for students in CTE programs. This is discrimination. At the high school, NONE of these things will be required. I feel like my sons are being punished for attending this school.

Sally Finchum

From: Jackie Gore
Sent: Tuesday, January 06, 2015 1:11 PM
To: Sally Finchum
Subject: Comments on Policy 2520.13

I have read through the proposed changes to Policy 2520 and am concerned as to how this could be implemented in the environment where I teach - a high school setting with 45-minute classes of students in grades 9-12 mixed, specifically the simulated workplace protocols.

Jackie B. Gore
Business Teacher
Washington High School
jbgore@k12.wv.us
(304) 885-5110

Sally Finchum

From: Jackie Gore
Sent: Tuesday, January 06, 2015 1:12 PM
To: Sally Finchum
Subject: Fw: Comments on Policy 2520.13

Also, all of the stakeholders mentioned are from CTE centers, not high schools. Is this policy for grades 9-12?

Jackie B. Gore
Business Teacher
Washington High School
jbgore@k12.wv.us
(304) 885-5110

From: Jackie Gore
Sent: Tuesday, January 6, 2015 1:10 PM
To: Sally Finchum
Subject: Comments on Policy 2520.13

I have read through the proposed changes to Policy 2520 and am concerned as to how this could be implemented in the environment where I teach - a high school setting with 45-minute classes of students in grades 9-12 mixed, specifically the simulated workplace protocols.

Jackie B. Gore
Business Teacher
Washington High School
jbgore@k12.wv.us
(304) 885-5110

Sally Finchum

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Thursday, January 08, 2015 3:21 PM
To: Sally Finchum
Subject: Comment Received for Policy 2520.13 (2015-01-08 15:20:54)

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This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2520.13

#####

Name: Christina Waybright
Organization: Randolph Technical Center
Title: Business Education Instructor
City/State: Elkins, West Virginia
Role: Teacher
Posted: 2015-01-08 15:20:54
Posted from IP:

Comments for section 126-44M-1 General

In the career cluster Business Management & Administration (BM 1410 Accounting), Microsoft Office Specialist Exam Excel should be included as one of the acceptable exams, as it is the most accounting related software in the Microsoft suite of programs. Additionally, the Microsoft Access exam should be added to the accounting career cluster as it is a database software that can be utilized for the purpose of tracking customers, inventory, fixed assets, and other accounting related business transactions.
You may also want to consider adding those same exams to BM 1430 Business Finance and all 4 of the Microsoft exams to BM 1479 Business Management and General Management and BM 1495 Entrepreneurship, as nearly all job postings in the business management and administration fields list knowledge of the Microsoft Suite as a requirement for employment.
Additionally, you may want to consider revising all areas to include future Microsoft exams, not just the 2013 version of t!

he exam, which will be outdated and not offered soon. The wording could say "Microsoft Office Specialist Exam Word 2013 or most recent version".

Sally Finchum

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Friday, January 09, 2015 2:09 PM
To: Sally Finchum
Subject: Comment Received for Policy 2520.13 (2015-01-09 14:08:40)

Please save this email in a "Comments Received Online" folder.
Your folder will be a backup. All comments are saved in our database.
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<http://wvde.state.wv.us/r.html?id=a4e129d7f93e319ad13edca65ac2d700>
This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2520.13

#####

Name: Andrea Voss
Organization: PSHS
Title: Teacher
City/State: Parkersburg, WV
Role: Teacher
Posted: 2015-01-09 14:08:40
Posted from IP:

Comments for section 126-44M-1 General

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The ACT WorkKeys is an authentic and advanced learning environment and fits a business simulation which can be used in high schools and is used in businesses today. The ACT WorkKeys does provide consistency to instructional practices and ensures work and career readiness by training students for an actual challenge in the workplace.

Comments for section 126-44M-2 Purpose

The purpose of these comments are to voice my concerns about changes that are a detriment to quality education in the CTE department.

Comments for section 126-44M-4 Summary of the Next Generation Content Standards

simulated workplace rnelminating ACT WorkKeys

Comments for section 126-44M-5 Severability

High schools should be exempt from the workplace simulation due to time constraints, student eligibility, and legal issues. rnrnACT WorkKeys is a measureable objective assessment that has a value beyond high school. A portfolio is a subjective assessment that exists only in the realm of the West Virginia public high school.

Sally Finchum

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Friday, January 09, 2015 2:09 PM
To: Sally Finchum
Subject: Comment Received for Policy 2520.13 (2015-01-09 14:08:54)

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Comment Received for Policy 2520.13

#####

Name: Rebecca Wilcox
Organization: Parkersburg South HighSchool
Title: Business Instructor
City/State: Parkersburg, WV
Role: Teacher
Posted: 2015-01-09 14:08:54
Posted from IP:

Comments for section 126-44M-2 Purpose

My purpose is to voice my concern for the changes implemented by the CTE staff at the state level without proper notification to those of us who are charged with teaching our students on a daily basis. We were not made aware of changes in WorkKeys testing, EOC exams, or the requirement of a student portfolio until October 2014.

Comments for section 126-44M-4 Summary of the Next Generation Content Standards

Policy 2520.13 includes Simulated Workplace protocols, eliminates the WorkKeys testing and replaces it with student portfolios and capstone projects.

Comments for section 126-44M-5 Severability

I don't believe that Simulated Workplace can be implemented in a regular high school setting. We are not able to choose our students by interviewing them. We provide some of the few elective courses within our school, and the choice of classes taken is made by the students and their counselors. Our school is reverting to 45 minute periods next school year. We could not afford to set aside one third of the class time for a "meeting" every day. I do not believe that we would legally be able to drug test our students. Technical schools which are set up for students to attend classes for 3 hours per day, all year, are better equipped to handle the Simulated Workplace. We simply are not. Elimination of the WorkKeys testing is troubling. The purpose of replacing it with the student portfolio and capstone project is to provide consistency to instructional practices and protocols. In our county, we have several manufacturing facilities which require the WorkKeys test !

prior to employment. Students were given a measurable, objective format when they were required to take the WorkKeys exam. Now, they are compiling a subjective portfolio of work. Unfortunately, our instructors were not made aware of the changes taking place until well into the current school year. This makes it extremely difficult to complete

portfolios for students whom we will not see again this year due to the fact that most of our completers do not have a business class next semester.



AMT
American Medical Technologists

Michael N. McCarty, Legal Counsel

Holland & Knight

800 17th Street, N.W., Suite 1100

Washington, DC 20006

Phone: (202) 469-5107

E-mail: michael.mccarty@hklaw.com

January 7, 2015

Dr. Donna Burge-Tetrick, Executive Director
WVDE Office of Career and Technical Instruction
Capitol Building 6, Room 243
1900 Kanawha Boulevard, East
Charleston, WV 25305-0330

RE: Proposed Policy 2520.13 – Next Generation Standards for Career and Technical Education in West Virginia Schools (Title 126, Series 44M) – Comments on Proposed Rule

Dear Dr. Burge-Tetrick:

American Medical Technologists (AMT) welcomes this opportunity to submit brief comments on the Department's proposed legislative rule, noticed in the December 12, 2014 *West Virginia Register*, titled Policy 2520.13: "Next Generation Standards for Career and Technical Education in West Virginia Schools" (Title 126, Series 144M).

AMT is a national nonprofit certification organization and professional society for allied health personnel including medical assistants, clinical laboratory technologists and technicians, phlebotomists, and related healthcare personnel. At the close of its 2014 fiscal year, AMT had 66,549 member-certificants in good standing nationally, including nearly 46,000 Registered Medical Assistants (RMAs). AMT maintains an active state society in West Virginia.

Many allied healthcare professionals who become certified by AMT have received career and technical training at public and private educational institutions, including institutions that would be subject to the Department's proposed Policy 2520.13. AMT's comments are focused exclusively on an apparent technical oversight contained in the proposed Performance Measure for WV CTE Concentration HE0715, Allied Health Services.

The proposed policy would replace several discipline-specific allied health concentrations with a more generic Allied Health Services concentration, and would revise the Performance Measure as follows:

To achieve mastery, students will score 80% or higher on the ~~Global 21 Performance Assessment~~; level 4 or higher on the ~~Reading for Information, Applied Mathematics and Locating Information ACT WorkKeys®~~ assessments; Student Portfolio and Capstone Project and, acquire the ~~CPR/BLS~~

Dr. Donna Burge-Tetrick, Executive Director
January 7, 2015
Page 2

Cardiopulmonary Resuscitation/Basic Life Support and Medical Assistant (~~MA, NCMA, or CMA~~) (**Medical Assistant, National Certified Medical Assistant, Certified Medical Assistant**, Emergency Medical Technician-Basic, Certified Nursing Assistant/Registered Nursing Assistant Certified Dental Assistant Registered Dental Assistant Pharmacy Technician Board Certified) credentials [emphasis added].

The parenthetical listing of recognized medical assisting credentials includes the generic term “Medical Assistant” along with two specific nationally recognized certifications for medical assistants. The two words “Medical Assistant” do not really refer to any credential at all; the actual names of existing credentials used nationwide are Registered Medical Assistant, Certified Medical Assistant, and National Certified Medical Assistant. We strongly recommend that the “**Registered Medical Assistant**” (RMA) certification awarded by AMT should be substituted in place of the generic designation “Medical Assistant.” We believe the omission of the RMA credential was inadvertent, as the Registered Medical Assistant is one of the longest-established and most widely respected certifications for medical assistants in the United States. AMT began certifying RMAs in 1972. Since its inception, the RMA certification program – like all of AMT’s exam-based certifications – has been fully accredited by the National Commission for Certifying Agencies (NCCA), the accrediting arm of the Institute for Credentialing Excellence.

Accordingly, AMT recommends that the proposed Performance Measure for WV CTE Concentration HE0715, Allied Health Services, be amended to state (in part): “...acquire the Cardiopulmonary Resuscitation/Basic Life Support and Medical Assistant (**Registered Medical Assistant**, National Certified Medical Assistant, Certified Medical Assistant,) credentials.”

Thank you for the opportunity to comment.

Sincerely,



Michael N. McCarty
AMT Legal Counsel

cc: Christopher A. Damon, JD, Executive Director
Kimberly A. Chevront, Ph.D., MBA, MT, Judiciary Councillor
Janet Crigler, MT, WVSSAMT President

Sally Finchum

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Monday, January 12, 2015 2:12 PM
To: Sally Finchum
Subject: Comment Received for Policy 2520.13 (2015-01-12 14:11:47)

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This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2520.13

#####

Name: Louis mynes
Organization: Ben Franklin Career Center
Title: Teacher
City/State: Dunbar, WV
Role: Teacher
Posted: 2015-01-12 14:11:47
Posted from IP:

Comments for section 126-44M-1 General

I don't see anything in policy about poor performers in our programs. We can't remove students from our programs that don't want to be in the program. Grades, absences, attitude
I don't see anything in policy about funding for all the changes that are being required. For me being in the NCCER program can not get funding for a state mandated program

Comments for section 126-44M-2 Purpose

Capstone project what is it? Students required to do 3 detailed projects in the Portfolio. How can something be put into a policy that hasn't been defined?
Concerning standards for participation in a co-curricular technical student organization. School has elected not to pay for all students to be part of a Student organization such as Skills

Comments for section 126-44M-4 Summary of the Next Generation Content Standards

Career Ready Practices, have not seen until looking at policy
#3 Attend to personal health and financial well-being. As a teacher it is not my responsibility, nor can I control this.
#4 Communicate clearly, what is considered a excellent writer and all the other stuff.
#10 Plan Education and Career Path, most of my students are here because they are told to do something, most do not plan on making carpentry a career.
Simulated workplace Protocols
#3 Testing 40% of students, cost to do this, who is going to pay for this. I can't get funding for materials to teach my field.
#10 What are /is 5S's Continuous Quality Improvement Principles
#11 What is/are Business and Industry Yearly Onsite Evaluations
Construction Career Pathway
Should NCCER cover the 10 goals for this concentration?
What are they considering a construction project?
#3 What is meant by Implement Testing And Inspection Procedures
#6 What is meant by Manage Relationship with Internal and External Partners?
#10 Participate in a co-curricular organization
AR 1820 Carpentry Concentration
To achieve Mastery, 80% or higher on student Portfolio, will students get a certificate if they don't?
Complete Core and Level 1 NCCER credentials.
Is this the only 2 levels required for NCCER?

January 9, 2015

Dr. Donna Burge-Tetrick, Executive Director

WVDE Office of Career and Technical Instruction

Capitol Building 6, Room 243

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

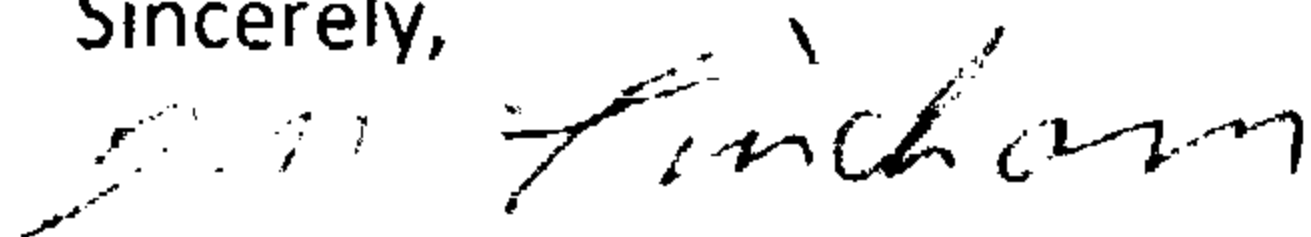
Dr. Tetrick,

The following are observations and questions I have in reference to Policy/Rule 2520.13!

1. I read throughout this document that there will be no cost to the state and the local BOE's. Who is going to pay for the drug tests, time clocks, new technology, etc. required to implement this program?
2. If we randomly drug test students and they fail the test, what do we do with those students. Are they not permitted to participate in the class until a later time, removed, etc. If they are removed, is this a FERPA violation?
3. Each class is to begin with a 5 to 10 minute company meeting and students must check in each day, is what I understand. This may be well and good for programs with 90 minute classes; however it could prove an issue for others.
4. I see this entire program very applicable for Technical Centers, but it seems a difficult item to insert in comprehensive high schools.

5. There is mention that students are to participate in technical student organizations. I cannot determine if this a requirement by the language. If it is required who is going to pay dues for those who refuse?
6. I observe that there are requirements in some program areas for Certified Pesticide Applicator Credentials! Is this being taught by the classroom teacher or by the WV Dept. of Ag. You need to be certified as an instructor to teach this program, if I am correct.
7. When the CTE staff was on site earlier this year in Jefferson County, I was told by some of the evaluators that this program has gone well in all programs to date. I have had conversation with some teachers that it has decreased their enrollment.
8. I was also told that all athletes in the state have to undergo random drug testing in every county. I have spoken with athletic directors who say this is not so, that is to cost prohibitive. Which is correct?
9. The only group I have been able to determine who undergoes random drug testing are the bus drivers.
10. I love CTE! It has been my heart and passion for over 40 years. I have no issues with programs which advance CTE. It is just my concern that we may be initiating a program without totally thinking it through! Thank you for your interest in the students of West Virginia!

Sincerely,



D Mitchell Fincham

Jefferson HS Ag Ed/FFA Advisor