

WEST VIRGINIA
SECRETARY OF STATE

JOE MANCHIN, III

ADMINISTRATIVE LAW DIVISION

Form #5

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OFFICE OF WEST VIRGINIA
SECRETARY OF STATE

NOTICE OF AGENCY ADOPTION OF A PROCEDURAL OR INTERPRETIVE RULE
OR A LEGISLATIVE RULE EXEMPT FROM LEGISLATIVE REVIEW

AGENCY: West Virginia Board of Education TITLE NUMBER: 126

CITE AUTHORITY: W.Va. Constitution, Article XII, §2, W.Va. Code §18-2-5; 18-2-7a; and 18-2E-5

RULE TYPE: PROCEDURAL _____ INTERPRETIVE _____

EXEMPT LEGISLATIVE RULE X

CITE STATUTE(S) GRANTING EXEMPTION FROM LEGISLATIVE REVIEW

W.Va. Code §§29A-3B-1, et seq.; W.Va. Board of Education
v. Hechler, 180 W.Va. 451; 376 S.E.2d 839 (1988).

AMENDMENT TO AN EXISTING RULE: YES XX NO _____

IF YES, SERIES NUMBER OF RULE BEING AMENDED: 13

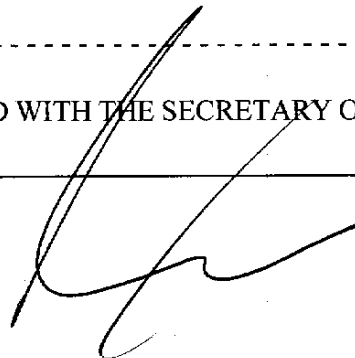
TITLE OF RULE BEING AMENDED: A Process for Improving Education Performance

Based Accreditation System (2320)

IF NO, SERIES NUMBER OF NEW RULE BEING PROPOSED: _____

TITLE OF RULE BEING PROPOSED: _____

THE ABOVE RULE IS HEREBY ADOPTED AND FILED WITH THE SECRETARY OF STATE. THE
EFFECTIVE DATE OF THIS RULE IS July 1, 2001



William J. Luff, Jr.
Associate State Superintendent of Schools

SCANNED

\$8.80

EXECUTIVE SUMMARY
WEST VIRGINIA BOARD OF EDUCATION
Office of Education Performance Audits

POLICY NUMBER AND TITLE: Policy 2320
A Process for Improving Education - Performance Based Accreditation System

BACKGROUND:

House Bill 4674, passed during the 2000 regular session of the West Virginia Legislature, amended W.Va. Code §18-2E-5 which required revision of State Board Policy 2320. The legislation calls for indicators of efficiency, an exemplary school accreditation status, immediate State Board intervention in the operation of a county school system, and a performance measure for percentage of students enrolled in advanced placement or honors classes. Additionally, the Agreed Order in Tomblin v. Gainer signed August 1, 2000 requires that specific issues be included as a part of the accreditation and evaluation process. These include the identification of resource needs. The proposed revisions include the requirements of House Bill 4674 and the Agreed Order in Tomblin v. Gainer. Policy 2320 was revised and was placed on public comment at the November 2000 Board meeting until January 11, 2001.

PURPOSE:

The purpose of this Board item is to amend the proposed Policy 2320 revisions according to the numerous responses received during the comment period.

PROPOSED REVISIONS:

Proposed revisions are made in the following sections in response to comments received.

- 4.4 Writing Assessment. The criterion for student achievement on the Writing Assessment was adjusted to 60% of students score at or above 2.0 in 2001-2002, 70% in 2002-2003, and 80% in 2003-2004 and for each year thereafter.
- 4.13 Percentage of graduates attaining minimum level of performance. Shows an increasing trend in two of the most recent three years was added.
- 4.14 Percentage of graduates attaining the 70th percentile shows an increasing trend in two of the most recent three years was added.
- 5.1.2 Curriculum based on instructional goals and objectives. Adjusted for clarification.
- 5.5.1 Facilities and equipment specified in Policy 6200, chapters 1 through 14, are available in all schools, classrooms, and other required areas. The change delineates responsibilities between and among agencies, specifically, the School Building Authority, West Virginia Legislature, and Education Performance Audits Team recommendations.
- 5.6.10 Local School Improvement Councils. Adjusted for clarification.
- 5.6.14 Statewide assessment. Adjusted for clarification.
- 5.10.12 American College Test and the Scholastic Aptitude Test. Revised to include county, principal, counselors, and teachers assess student scores.
- 5.11 Safe, Drug Free, Violence Free, and Disciplined Schools. Included staff.

- 5.11.1 School rules, procedures, and expectations. Included, are enforced.
- 5.11.6 Presidential Physical Fitness Test. Removed 2000-01.
- 5.12.1 Leadership. Included central office administrators.
- 5.12.4 & Education leader. Revised to "education leaders."
- 5.12.5
- 6.1.1 Curriculum. Revised for clarification.
- 6.1.6 Regional Educational Service Agency. Language changed for consistency with State Code.
- 7.1 Unified County Improvement Plan. Original December 31 submission date reinstated.
- 7.2 Unified School Improvement Plan. Original September 30 submission date reinstated.
- 8.3 Full accreditation status. Description of full accreditation status included.
- 9.2 Exemplary accreditation - attendance. Revised to 94 percent.
- 9.3 Exemplary accreditation - dropout. Revised to 3.6 percent.

Editorial revisions in the following sections:

- 4.1 - 4.15 Introductory statements for consistency with introductory statements for the High Quality Standards,
- 5.6.12 Codes of conduct. Included, "and routinely investigate and monitor."
- 5.10 Student School Performance. Included, "and encouraged."
- 5.10.1 Grading policy. Included, "that is consistent with student confidentiality."
- 5.10.3 Counseling services. "Counseling services are available for each student and."
- 5.10.7 Principal feedback. Included, "to the teacher and student."
- 5.12.1 - 5.12.5 Introductory statements included.
- 5.12.5 Professionalism. Revised language, "function within their legal authority."
- 12.6 & throughout State Board revised to West Virginia Board of Education.
- 14.1 Punctuation added following "in part."

West Virginia Board of Education revisions in the following sections:

- 4.16 Presidential Physical Fitness Test move back to Annual Performance Measures.
- 5.6.11 Faculty Senate. Included, "The meetings of the faculty senate are scheduled to maximize instructional time."

IMPACT:

Upon Board approval, pilots of Policy 2320 will be conducted during March and April with full implementation by July 1, 2001 as directed on the Tomblin v. Gainer Agreed Order.

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**TITLE 126
LEGISLATIVE RULE
BOARD OF EDUCATION**

**SERIES (13)
A PROCESS FOR IMPROVING EDUCATION
PERFORMANCE BASED ACCREDITATION SYSTEM (2320)**

§126-13-1. General.

1.1. Scope. -- This rule establishes a system of education performance audits which measures the quality of education and the preparation of students based on the standards and measures of student, school, and school system performance and processes. The system of performance audits shall assist the West Virginia Board of Education in ensuring that the high quality educational standards and annual performance measures are met by schools and school systems and that a thorough and efficient system of schools is provided. Part of this rule implements the agreed order in Tomblin v. Gainer, August 1, 2000 and amended September 12, 2000.

1.2. Authority. -- W.Va. Constitution, Article XII, §2; W.Va. Code §§18-2-5; 18-2-7a; and 18-2E-5.

1.3. Filing Date. -- February 27, 2001

1.4. Effective Date. -- July 1, 2001

1.4.1. Unless specified otherwise within the policy.

§126-13-2. Purpose.

2.1. The West Virginia Board of Education establishes a process for improving education that includes standards, assessment, accountability, and capacity building to provide assurances that a thorough and efficient system of schools is being provided for all West Virginia public school students on an equal education opportunity basis and that

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the high quality standards are, at a minimum, being met. This requires the provision of an adequate level of appropriately managed resources.

2.2. The accreditation process will include an evaluation of each school's needs for facilities, personnel, curriculum, equipment and materials and how those impact program and student performance.

2.3. Each school is expected to meet performance measures in the following areas: student performance as measured by a uniform statewide assessment program; school attendance rate; student dropout rate; graduation rate; average class size; pupil-teacher ratio; and number of exceptions to that ratio requested by county boards and number granted; number of split-grade classrooms; percent of graduates who enrolled in college or other post-secondary education, and percent of graduates who become fully employed within one year of high school graduation as reported by the graduates on the assessment form attached to their individualized transition plan; pupil-administrator ratio; parent involvement; parent, teacher, and student satisfaction; operating expenditure per pupil; percent of graduates who attain the minimum level of performance in the basic skills recognized by the West Virginia Board of Education and the grade level distribution in which the minimum level of performance was met.

2.4. The performance measures and high quality standards provide assurance that schools and county boards are making progress in achieving the education goals of the state of West Virginia:

2.4.1. Goal 1. All children entering the first grade will be ready for the first grade.

2.4.2. Goal 2. All students will have equal education opportunity.

2.4.3. Goal 3. Student performance on national measures of student performance will equal or exceed national averages and the performance of students falling in the lowest quartile will improve by fifty percent.

2.4.4. Goal 4. Ninety percent of ninth graders will graduate from high school.

2.4.5. Goal 5. High school graduates will be fully prepared for college, other post-secondary education or gainful employment. The number of high school graduates entering post-secondary education will increase by fifty percent.

2.4.6. Goal 6. All working age adults will be functionally literate.

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§126-13-3. Responsibility.

3.1. The West Virginia Board of Education has responsibility through the system of education performance audits to assist it in ensuring that a thorough and efficient system of schools is being provided and to improve student, school, and school system performance through an assessment and accountability system that includes:

3.1.1. The assessment of student, school, and school system performance and the processes in place in schools and school systems which enable student performance.

3.1.2. The review of school and school system Unified Improvement Plans.

3.1.3. The periodic, random, unannounced on-site review of school and school system performance and compliance with the standards.

3.2. The West Virginia Board of Education shall use school and school system assessment information from the system of education performance audits to assist it in the following:

3.2.1. Determining school accreditation and school system approval status.

3.2.2. Holding schools and school systems accountable for the efficient use of existing resources to meet or exceed the standards.

3.2.3. Targeting additional resources when necessary to improve performance.

3.3. The West Virginia Board of Education shall make accreditation information available to the Legislature; the Governor; and to the general public and any individuals who request such information subject to the provisions of any act, rule, or regulation restricting the release of information.

3.4. The West Virginia Board of Education shall establish early detection and intervention programs to assist underachieving schools and school systems in improving performance before conditions become so grave as to warrant more substantive state intervention, including, but not limited to, making additional technical assistance, programmatic, monetary, and staffing resources available where appropriate.

3.5. The Office of Education Performance Audits shall assist the West Virginia Board of Education in making determinations regarding the accreditation status of schools and the approval status of school systems.

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3.6. The West Virginia Education Information System staff shall provide the Office of Education Performance Audits research and analysis data on the performance of students, schools, and school systems.

3.7. The Office of Education Performance Audits shall receive assistance from the State Department of Education to carry out the duties assigned to the office.

3.8. The Office of Education Performance Audits shall receive assistance from the School Building Authority to carry out the duties assigned to the office.

3.9. Responsibilities of the Office of Education Performance Audits include the following:

3.9.1. Assure that all statewide assessments of student performance are secure.

3.9.2. Administer all accountability measures.

3.9.3. Determine what capacity may be needed by schools and school systems to meet the standards established by the Legislature and the West Virginia Board of Education, and recommend to the school, school system, and West Virginia Board of Education, plans to establish those needed capacities.

3.9.4. Determine whether statewide system deficiencies exist in the capacity to establish and maintain a thorough and efficient system of schools, including the identification of trends and the need for continuing improvements in education, and report those deficiencies and trends to the West Virginia Board of Education.

3.9.5. Determine staff development needs of schools and school systems to meet the standards established by the Legislature and the West Virginia Board of Education, and make recommendations to the West Virginia Board of Education, the center for professional development, regional education service agencies, higher education governing boards, and county boards.

3.9.6. Identify exemplary schools and school systems and best practices that improve student, school, and school system performance, and make recommendations to the West Virginia Board of Education for recognizing and rewarding exemplary schools and school systems and promoting the use of best practices.

§126-13-4. Annual Performance Measures. Student achievement, attendance, and dropout data are reviewed annually to determine the accreditation status of schools and the approval status of county boards. No later than the 2003-2004 school year, new student achievement standards will be applied that are based upon a value-added approach, which shall include, but shall not be limited to: 1. Annual changes in students'

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scores, 2. trends in scores, and 3. goals for schools in average scores. The remaining performance measures may be reviewed annually or randomly by on-site review teams.

4.1. Achievement. A minimum of fifty percent (50%) of the school's students in grades 3 through 11 perform at or above the 3rd quartile in total basic skills; and no more than fifteen percent (15%) of the students perform within the 1st quartile, or the percentage of students performing within the 1st quartile is decreased based on two (2) of the most recent three (3) years. (Education Goal 3) This performance measure will be applied until the new statewide assessment instrument is adopted and implemented. The value-added performance measures will be included and phased in as baseline data are available on the new statewide assessment. (Effective 2003-2004)

4.2. Attendance rate. The student attendance rate is at or above 92.5% for the 2000-2001 and 2001-2002 school years; and 93% for subsequent years, adjusted for students excluded as a result of the Productive and Safe Schools Act (W.Va. Code §18A-5-1a) and school bus transportation interruptions. (Policy 4110)

4.3. Dropout rate. The maximum student dropout rate is five percent (5%) in two (2) of the most recent three (3) years, or in the most recent year for which data are available. The dropout rate is calculated according to the formula of the National Center for Education Statistics.

4.4. Writing Assessment. A minimum of sixty percent (60%) of the school's students score at or above 2.0 on the Writing Assessment for the 2001-2002 school year or show an increasing trend in two (2) of the most recent three (3) years; seventy percent (70%) score at or above 2.0 for the 2002-2003 school year or show an increasing trend in two (2) of the most recent three (3) years; and eighty percent (80%) score at or above 2.0 for the 2003-2004 school year or show an increasing trend in two (2) of the most recent three (3) years.

4.5. Graduation rate. The minimum graduation rate is at or above ninety-five percent (95%). The graduation rate will be considered as the inverse of the dropout rate and will be applied when data are reported in the *West Virginia Report Cards*. (Effective 2002-2003) (Education Goal 4)

4.6. Pupil-teacher ratio. No teacher shall have more than 20 pupils in kindergarten, 25 pupils in grades 1 through 3, and 25 pupils in grades 4 through 6, excluding chorus, band, and orchestra. Exemptions may be granted for no more than 3 additional pupils per teacher for kindergarten and grades 4 through 6 (W.Va. Code §18-5-18a).

4.7. Split-grade classrooms. The number of split-grade classrooms does not exceed the number that existed as of January 1, 1983. (W.Va. Code §18-5-18a)

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4.8. Certified principals. All schools are served by a certified principal. There is a full-time principal at each school in which the net enrollment equals or exceeds one hundred seventy students based on the previous year's 2nd month enrollment report. No principal is assigned more than two schools. (W.Va. Code §18A-2-9)

4.9. Operating expenditures per pupil. Average operating expenditures per pupil are based on the average daily attendance for the current year and are at or above the per pupil allocation for the county provided by the state aid formula.

4.10. Graduates enrolled in college, post-secondary education, or fully employed. The percentage of responding graduates enrolled in college, enrolled in other post-secondary education, or fully employed within one year of graduation is ninety-five percent (95%) or above for the year 2003 graduates excluding those graduates electing to pursue other options.

4.11. Parent involvement. The level of parent involvement shows an increasing trend during the most recent three (3) years or is at or above sixty percent (60%).

4.12. School satisfaction. The average combined percentage of parent, teacher, and student satisfaction with the school is at or above seventy-five percent (75%).

4.13. Graduates attaining the 50th percentile in total basic skills. The percentage of graduates attaining the minimum level of performance (50th percentile) in total basic skills is at or above sixty percent (60%) or shows an increasing trend in two (2) of the most recent three (3) years. (Effective 2001-2002)

4.14. Graduates attaining the 70th percentile in total basic skills. The percentage of graduates attaining the 70th percentile in total basic skills is at or above thirty-three percent (33%) or shows an increasing trend in two (2) of the most recent three (3) years. (Effective 2001-2002)

4.15. Enrollment in advanced placement and/or honors classes. The percentage of students in grades 9 through 12 enrolled in advanced placement and/or honors classes is at or above five percent (5%). (W.Va. Code §18-9A-1; Policy 2510)

4.16. Presidential Physical Fitness Test. The percentage of students in grades K-9 passing the Presidential Physical Fitness Test at one of the following levels: Presidential, National, or Fitness is forty percent (40%) or above or shows an increasing trend during the most recent three (3) years. (W.Va. Code §18-2-7a)

§126-13-5. High Quality Standards. The West Virginia Board of Education hereby adopts education standards for student, school, and school system performance and processes in the following areas: Curriculum; workplace readiness skills; finance; transportation; special education services, alternative education, and other programs; facilities; administrative practices and school community relations; training county board members and administrators; personnel qualifications; professional development and evaluation; student and school performance; a code of conduct for students and employees; and safe and disciplined schools. Each county board of education, in order

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to define its education program, shall establish policies and implement written procedures that reflect the education standards adopted by the West Virginia Board of Education.

5.1. Curriculum. Programs of study are arranged so that curriculum, instructional practices, and instructional materials ensure that all students have equal opportunity to acquire the knowledge and skills needed to succeed academically and in the workplace.

5.1.1. Mission and goals. The mission and goals of the school provide direction for planning the school's education program. (Policy 2510)

5.1.2. Curriculum based on instructional goals and objectives. The curriculum is based on the instructional goals and objectives approved by the West Virginia Board of Education and the mission of the school is consistent therewith. Appropriate copies of the instructional goals and objectives are provided to each teacher and to the public upon request. (Policy 2510; Policy 2520)

5.1.3. High expectations. Through curricular offerings, instructional practices, and administrative practices, staff demonstrate high expectations for the learning and achieving of all students. (Policy 2510)

5.1.4. Learning environment. School staff fosters an environment conducive to learning. (Policy 2510)

5.1.5. Curriculum team. A school curriculum team is functioning at each school to establish the programs and methods for implementing a curriculum. (W.Va. Code §18-5A-6)

5.1.6. Instruction. Instruction is consistent with the programmatic definitions in Policy 2510. (Policy 2510)

5.1.7. Protected instructional time. Priority is given to teaching and learning, and classroom instructional time is protected from interruption. (Policy 2510)

5.1.8. Instructional strategies. Staff demonstrate the use of the various instructional strategies and techniques contained in Policies 2510 and 2520. (Policy 2510; Policy 2520)

5.1.9. Instruction in writing. Instruction in writing shall be a part of every child's weekly educational curriculum in grades 1 through 12 in every appropriate class. (Policy 2510; Policy 2520)

5.1.10. Library/educational technology access. Students have regular access to library/educational technology centers or classroom libraries. (Policy 2470; Policy 2510)

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5.1.11. Technology application. The application of technology is included throughout all programs of study. (Policy 2470; Policy 2510; Policy 2520)

5.1.12. Instructional materials. Sufficient numbers of approved up-to-date textbooks, instructional materials, and other resources are available to deliver curricular content for the full instructional term. (Policy 2510)

5.1.13. Reteaching. School personnel assess student progress and provide reteaching to students not achieving mastery of the instructional goals and objectives. (Policy 2510)

5.1.14. Programs of study. Programs of study are provided in grades K-12 as listed in Policy 2510 for early, middle, and adolescent levels, including career clusters and majors. Note: Any changes approved by the West Virginia Board of Education pursuant to the agreed order in *Tomblin v. Gainer* dealing with vocational programs will also be included. (Policy 2510; Policy 2520)

5.1.15. Enrichment and acceleration. School personnel provide students enrichment and acceleration opportunities. (Policy 2510)

5.1.16. Career clusters. Students in grades 5-8 have the opportunity to examine a system of career clusters and to select a career cluster to explore in grades 9 and 10. (Policy 2510)

5.1.17. Approved elective offerings. An elective offering must be based on approved West Virginia Board of Education instructional goals and objectives or have written goals and objectives that are approved by the county board. (Policy 2510)

5.1.18. Guidance and advisement. Students are provided guidance and advisement sufficient to allow them to choose a career major prior to completion of grade 10. (Policy 2510)

5.1.19. Work-based learning. Work-based learning experiences aligned with classroom instruction are provided for all students during at least one year in grades 9-12. (effective for students entering grade 9 in 1999-2000) (Policy 2510)

5.1.20. Multicultural education. Multicultural education is taught at each programmatic level, K-4, 5-8, and 9-12 with an emphasis on prevention and zero tolerance for racial, sexual, religious/ethnic harassment or violence. (Policy 2421)

5.1.21. Instructional day. An instructional day is provided that includes a minimum of 315 minutes for kindergarten and grades 1 through 4; 330 minutes for grades 5 through 8; and 345 minutes for grades 9 through 12. The county board submits a school calendar with a minimum 180 instructional days. (W.Va. Code §18-5-15; Policy 2510)

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5.2. Finance. Resource allocations ensure that all students are provided equal education opportunities through qualified personnel; safe, efficient, and adequate facilities and transportation services; and adequate instructional materials, supplies, and equipment.

5.2.1. Casual deficit. The county board does not have a deficit greater than a casual deficit. (W.Va. Code §18-2E-5)

5.2.2. Resource distribution. The county board and each school distributes the system's resources on the basis of the Unified County Improvement Plan and the Unified School Improvement Plan. (Policy 2510)

5.2.3. Accounting practices. The county board's and individual school's accounting practices are consistent with state policies and procedures. (W.Va. Code §§18-9B-9, 10, 11; and 18-4-10; Policy 1224.1; Policy 8100)

5.2.4. Faculty senate funds. The faculty senate monitors the funds allocated to individual classroom teachers and librarians from legislative appropriations. The remainder of the funds is expended in accordance with a budget approved and monitored by the faculty senate. (W. Va. Code §18-5A-5)

5.3. Transportation. Adequate transportation services are provided in a safe and efficient manner within, wherever possible, the recommended time guidelines in Policy 6200.

5.3.1. Transportation services. The county board provides safe transportation and special transportation services for eligible students. (Policy 2419; Policy 4334; Policy 4335)

5.3.2. Full instructional day. Transportation is provided so that students attend the full instructional day. (Policy 2419; Policy 2510)

5.4. Special Education Services, Alternative Education, and Other Programs. Special education services, alternative education, and other programs are provided that meet the education needs of students.

5.4.1. Location and space. Special education services, alternative education, and other programs have adequate space and are appropriately located to meet the needs of the students. (Policy 2418; Policy 2419)

5.4.2. Alternative education. Alternative education programs meet the requirements of Policy 2418. (W.Va. Code §§18-2-6 and 18-5-19; Policy 2418)

5.4.3. Monitoring results. Special education services and other program monitoring results have been reviewed, and citations have been corrected or an approved plan exists for correction. (Policy 2419)

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5.5. Facilities. School facilities are safe and meet the needs of students in an efficient and economical manner.

5.5.1. Facilities and equipment. Facilities and equipment specified in Policy 6200, Chapters 1 through 14, are available in all schools, classrooms, and other required areas. A determination will be made by using the Process for Improving Education (W.Va. Code §18-2E-5) whether any identified deficiencies adversely impact and impair the delivery of a high quality educational program. Note: Corrective measures to be taken in response to any identified resource deficiency will of necessity be subject to the feasibility of modifying existing facilities, consideration of alternative methods of instructional delivery, availability of funding, and prioritization of educational needs through Comprehensive Educational Facilities Plans and the West Virginia School Building Authority. This policy is in no way to be interpreted to preclude; direct; or refute the authority, judgment, or priorities of the School Building Authority who is statutorily responsible for prioritizing "Need" for the purpose of funding school improvements or school construction in the State of West Virginia or the prerogative of the Legislature in providing resources. (Policy 6200 and Tomblin v. Gainer)

5.5.2. Regulatory agencies. Fire marshal and health department citations have been corrected or a plan exists for correction. (W.Va. Code §§18-3-9a; 29-3-5; and 29-12-5a)

5.5.3. Safe and healthy facilities. Buildings, grounds, furnishings, and equipment are free from observable safety hazards. (W.Va. Code §18-5-9; Policy 6200)

5.5.4. Accessible facilities. Buildings, grounds, furnishings, programs, and equipment are accessible to students with disabilities. (Section 504, Rehabilitation Act of 1973 §§104.22 and 104.23; Policy 6200)

5.6. Administrative Practices and School-Community Relations. Schools, communities, and local businesses develop collaborative partnerships that support teaching and learning to ensure that schools deliver a high quality education program and are centers for lifelong learning.

5.6.1. Communication. The superintendent and/or principal ensures that formal and informal mechanisms exist for communication within the county, the school, and the community. (Policy 2510)

5.6.2. Technology plan. The county and each school conduct a technology needs assessment and develop county and school technology plans to improve instruction. (Policy 2510)

5.6.3. Parents provided information. Staff members provide parents with information and techniques for helping students learn. (Policy 2510)

5.6.4. Health services. Health services are provided to all students to maximize learning potential. (W.Va. Code §§16-3-4, 4a; 18-5-17 and 22)

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5.6.5. Attendance director. An attendance director is employed to ensure regular school attendance. (W.Va. Code §§18-8-1a and 3; Policy 2510)

5.6.6. Data-based decisions. Decisions by teachers, principals, and administrators are based upon current student data and the best instructional practices. (Policy 2510)

5.6.7. Business/Community Relationship. The county and schools involve active business partners in education and coordinate business vocational needs and vocational college offerings. (Policy 2510)

5.6.8. Kindergarten program. A full day, everyday kindergarten program is in place or a waiver has been granted by the state superintendent. (W.Va. Code §18-5-18)

5.6.9. Nutrition program. The school provides meals that meet or exceed the minimum standards established by federal regulations, Policy 4320 and Policy 4321.1. (P.L. 95-166; 7CFR 210, 220; W.Va. Code §18-5-37; Policy 4320; Policy 4321.1)

5.6.10. Local school improvement council. A local school improvement council is established, functioning, and meets the statutory requirements. The county board meets at least once a year with the council and considers recommendations and Unified School Improvement Plans from the council in decision making. (W.Va. Code §§18-5A-2 & 18-5-14; Policy 5500.03)

5.6.11. Faculty senate. A faculty senate comprised of all permanent, full-time professional educators employed at the school is established and functioning at each school and meets the statutory requirements. The meetings of the faculty senate are scheduled to maximize instructional time. (W.Va. Code §18-5A-5; Policy 2510)

5.6.12. Codes of conduct. The county and schools implement and routinely investigate and monitor the code of conduct for students and the code of conduct for employees. (W.Va. Code §18-2E-5; Policy 4373; Policy 5902)

5.6.13. Planning and Lunch Periods. Teachers are provided a duty-free planning period that is the length of the usual class period and is not less than thirty minutes and teachers and service personnel are provided a duty-free lunch period. (W.Va. Code §18A-4-14)

5.6.14. Statewide assessment. Test security measures are in place for mandated statewide testing. All students in the school participate in the statewide assessment program that includes norm-referenced assessments at grades K-11, the ACT Explore at grade 8, an assessment at grade 12, and the writing assessment at grades 4, 7, and 10. Students with disabilities who have an Individualized Education Program (IEP) or a Section 504 Plan may be assessed on the norm-referenced test under one of the following conditions: standard conditions, standard conditions with accommodations, or non-standard conditions with modifications. Students unable to participate in the norm-

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referenced assessment under these conditions and who meet the alternate assessment criteria will participate in the West Virginia Alternate Assessment. Education Performance Audit teams will verify the eligibility of any student tested under non-standard conditions. If less than 90 percent of students are tested under standard conditions the reasons must be documented through IEPs, 504 plans, or attendance records. (Policy 2340; Policy 2419; Policy 2510)

5.6.15. Skills improvement program. Any student performing below the 50th percentile in the areas of reading, mathematics, and/or language at grade 8 or above is placed in a skills improvement program in those areas of deficiency. (Policy 2510)

5.6.16. Certificate of proficiency and a warranty seal. A certificate of proficiency is issued to each graduate and a county warranty seal, stamp, or other appropriate symbol is awarded to every student who has achieved a proficiency level of the 50th percentile at grade 11 on the West Virginia Board of Education approved standardized achievement test in the areas of reading, mathematics, and language indicating competency for a basic skills warranty. Every student who scores at or above the 70th percentile at grade 11 in reading, mathematics, and language on the West Virginia Board of Education approved standardized achievement test is awarded a warranty for competency for advanced work place positions and entry into post-secondary education. (Policy 2510)

5.6.17. West Virginia Education Information System. The county and school participate in the West Virginia Education Information System (WVEIS).

5.7. Training County Board Members. Training programs for county board members support the county education program and contribute to improved leadership performance by including activities related to board membership and governance effectiveness.

5.7.1. Annual Training. County board members whose terms of office commence after August 30, 1990, receive annually a minimum of seven hours of training through the West Virginia School Boards Association or other organizations approved by the West Virginia Board of Education, including effective board service, personnel relations/development, policy development, school finance, curriculum and instruction, school law, communication, community relations, and leadership. Members of a county board elected after July 1, 1990, shall complete an orientation relating to board membership and governance, unless they took office prior to July 1, 1988, and have served continuously therefrom. (W.Va. Code §§18-2E-4 and 5 and 18-5-1a)

5.8. Personnel. County boards shall employ personnel to deliver high quality programs and services to all public school students that ensure academic success; implement employment and assignment practices that conform with W.Va. Code and West Virginia Board of Education policy; and promote the development of human resources.

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5.8.1. School personnel. Adequate administrative, instructional, support, and service personnel are provided to deliver the programs of studies and services that meet West Virginia Code and the West Virginia Board of Education policies. (Policy 2320; Policy 2510; Policy 2520; Tomblin v. Gainer)

5.8.2. Hiring. County boards employ the most qualified applicant to ensure student academic success. (W.Va. Code §§18A-4-7a and 8)

5.8.3. Licensure. Professional educators and other professional employees required to be licensed under West Virginia Board of Education policy are licensed for their assignments including employees engaged in extracurricular activities. (W.Va. Code §18A-3-2; Policy 5202)

5.8.4. Service personnel. Service personnel meet qualifications for their classifications and assignments. (W.Va. Code §18A-4-8)

5.9. Professional Development and Evaluation. School personnel improve their knowledge and job performance to ensure the delivery of high quality programs and services that promote the success of all students.

5.9.1. Evaluation. The county board adopts and implements an evaluation policy for professional and service personnel that is in accordance with W.Va. Code, West Virginia Board of Education policy, and county policy. (W.Va. Code §18A-2-12; Policy 5310; Policy 5314)

5.9.2. Excellence in teaching. Excellence in teaching is acknowledged through recognition programs at the county or school level. (Policy 2320)

5.9.3. Staff development. The county board administers and implements a staff development program for professional educators and service personnel that conforms with W.Va. Code, West Virginia Board of Education policies, and county board policies. (W.Va. Code §18A-3-8; Policy 5500; Policy 5500.02)

5.9.4. Principals' academy. All principals meet the requirements for training through the principals' academy. (W.Va. Code §18A-3-2c; Policy 2510; Policy 5500.03)

5.9.5. Teacher and principal internship. The county board develops and implements a beginning teacher internship program that consists of the nine components in W.Va. Code §18A-3-2b and a beginning principal internship program. (W.Va. Code §§18A-3-2b and 2d; Policy 5899; Policy 5900)

5.10. Student and School Performance. The school's education program ensures that: students are taught at developmentally appropriate levels; provided the opportunity and encouraged to advance to their potential; and graduate with the knowledge and skills needed to succeed in a competitive, changing society.

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5.10.1. Grading policy. The county develops and implements a policy for grading that is consistent with student confidentiality. (Policy 2510; Policy 4350)

5.10.2. Unified School Improvement Plan. A formal written Unified School Improvement Plan is established, implemented, and reviewed annually. (Policy 2510)

5.10.3. Counseling services. Counseling services are available for each student and school counselors spend at least seventy-five percent (75%) of their time assisting students through individual or group counseling, developmental guidance, academic planning, and career counseling. (W.Va. Code §18-5-18b; Policy 2315)

5.10.4. Student transition plans. Five year two part individualized student transition plans, covering grades nine through twelve and the first year after graduation from high school, are prepared and on file for students. (First Phase effective for students entering grade 8 1998-1999 and Second Phase effective for students entering grade 10 2000-2001) (W.Va. Code §18-2E-8; Policy 2510)

5.10.5. Equal education opportunities. All students have equal education opportunities. (Policy 2510)

5.10.6. Lesson plans. Lesson plans that are based on approved Instructional Goals and Objectives are prepared in advance and the principal reviews and comments on them a minimum of once each quarter. (Policy 2510; Policy 5310)

5.10.7. Principal feedback. The principal or designee observes teacher and student performance in the classroom and provides feedback to the teacher and student. (Policy 5310)

5.10.8. Data analysis. Prior to the beginning of and through the school term the county, school, and teacher have a system for analyzing, interpreting, and using student performance data to identify and assist students who are not at grade level in achieving approved state and local instructional goals and objectives. (Policy 2510)

5.10.9. Dropout rate monitoring. A system to monitor the dropout rate is in place and, when appropriate, a plan is implemented to decrease the student dropout rate. (Policy 2510)

5.10.10. Student Assistance Team. A Student Assistance Team is established, and functioning, and meeting the responsibilities outlined in Policy 2510. (Policy 2510)

5.10.11. Graduate assessment form. Each graduate is provided an assessment form and is requested to complete and return the form to the high school at the end of the first year following graduation. The data from the assessment are used for

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curriculum and instructional modification. (effective 2003-2004) (W.Va. Code §18-2E-8; Policy 2510)

5.10.12. American College Test and the Scholastic Aptitude Test. The county, principal, counselors, and teachers assess student scores on the American College Test and the Scholastic Aptitude Test and develop curriculum, programs, and/or practices to improve student and school performance.

5.11. Safe, Drug Free, Violence Free, and Disciplined Schools. The county and school maintain a safe, drug free, violence free, and disciplined learning environment that ensures the physical, social, and emotional well being of students and staff.

5.11.1. School rules, procedures, and expectations. School rules, procedures, and expectations are written, clearly communicated to students, parents, and staff, and enforced. (Policy 2510)

5.11.2. Individual differences. Individual differences are respected so that each student feels valued. (Policy 2510)

5.11.3. Preventive discipline and student involvement. A preventive discipline program that may include the Responsible Students Program and a student involvement program that may include a peer mediation program are in place. (W.Va. Code §18-5A-2)

5.11.4. Safe school plan. A countywide safe school plan is implemented in each school. (W.Va. Code §18-5A-2)

5.11.5. Policy implementation. The county and schools implement: a policy governing disciplinary procedures; policies governing student due process rights and nondiscrimination; the Racial, Sexual, Religious/Ethnic Harassment, and Violence policy; an approved policy on tobacco use; and an approved policy on substance abuse. (W.Va. Code §§18A-5-1 and 18-8-8; Policy 2422.5; Policy 2422.5A; Policy 4370)

5.12. Leadership. Effective leadership exists at the school district, school, and, classroom levels.

5.12.1. Vision. The county board of education, county superintendent, central office administrators, and principals facilitate the development, articulation, and implementation of a vision and goals that are shared and supported by the school community. (Policy 5500.03)

5.12.2. School culture and instruction. The principal develops, nurtures, and sustains the development of a school culture and instructional program that is conducive to student learning and staff professional development. (Policy 5500.03)

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5.12.3. Management and environment. The education leaders that include the principal, assistant principal, and teachers ensure management of the organization, operations, and resources for a safe, efficient, and effective learning environment. (Policy 5500.03)

5.12.4. Community. The education leaders, at each level in the school system, collaborate with families and community members, respond to diverse community interests and needs, and access community resources. (Policy 5500.03)

5.12.5. Professionalism. The education leaders act with integrity, fairness, in an ethical manner and function within their legal authority. (Policy 5500.03)

§126-13-6. Indicators of Efficiency. Indicators of efficiency for student and school system performance and processes will be reviewed in the following areas: Curriculum delivery, including but not limited to, the use of distance learning; facilities; administrative practices; personnel; utilization of regional education service agency programs and services that may be established by their assigned regional education service agency, or other regional services that may be initiated between and among participating county boards.

6.1. Indicators of Efficiency. The school district and school use existing resources efficiently and effectively for student and school system performance.

6.1.1. Curriculum. The school district and school conduct an annual curriculum audit regarding student curricular requests and overall school curriculum needs, analyze results, and include alternate methods of delivery as needed including satellite delivery and distance learning in combination with accessible and available resources.

6.1.2. Transportation. The school district evaluates the cost containment and effectiveness of the transportation system and provides students safe and efficient transportation services consistent with State laws and policies.

6.1.3. Facilities. Schools are operated efficiently, economically, safely, and without waste or duplication, and the number and location of schools efficiently serves the student population. (W. Va. Code §§18-9D-15 and 18-9D-16d)

6.1.4. Administrative practices. The school district assesses the assignment of administrative personnel to determine the degree to which managerial/administrative services provided to the schools establishes and supports high quality curriculum and instructional services.

6.1.5. Personnel. The school district assesses the assignment of personnel as based on West Virginia Code and West Virginia Board of Education of Education policies to determine the degree to which instructional and support services provided to the schools establishes and supports high quality curriculum and instructional services.

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6.1.6. Regional Educational Service Agency. The school district effectively utilizes Regional Educational Service Agency programs and services or other regional services that may be initiated between and among county boards.

§126-13-7. County and School Improvement Plan Process.

7.1. Each county board develops and submits a Unified County Improvement Plan or an equivalent strategic plan to the West Virginia Office of Education Performance Audits by December 31, 1997, and an update each year thereafter. This plan is based on information from the Unified School Improvement Plans, locally identified needs, and school performance data. The plan specifies strategies for meeting high quality standards and performance measures that have not been met.

7.2. Each school develops a Unified School Improvement Plan or an equivalent strategic plan by September 30 and annually submits to the West Virginia Office of Education Performance Audits a checklist indicating compliance with the high quality standards and performance measures and specific plans to meet standards and performance measures not met. The plan is based on the identified needs of the students and is developed collaboratively by the local school improvement council, the principal, faculty senate, and school curriculum team.

7.3. The county superintendent and board president and each school's principal shall sign a statement acknowledging that the information submitted in the county and school Unified Improvement Plan and checklist is accurate in accordance with W.Va. Code §18-2E-6. Willfully or knowingly falsifying information contained in the annual school checklist shall result in the administrative leader's certificate being revoked.

7.4. Periodic, random, and unannounced on-site review teams assess the county's and schools' compliance with the high quality standards and performance measures. (W.Va. Code §18-2E-5) The teams will review effectiveness of the Unified County Improvement Plan and the Unified School Improvement Plans.

§126-13-8. School Accreditation Status.

8.1. The West Virginia Board of Education annually shall review the information from the system of education performance audits submitted for each school and shall issue to every school one of the following: Exemplary accreditation status, full accreditation status, conditional accreditation status, temporary accreditation status, or seriously impaired status.

8.2. Exemplary accreditation status shall be issued to a school when the measure of the school's student and school performance substantially exceeds the minimal level performance on the standards in this policy.

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8.3. Full accreditation status shall be issued to a school when the measure of the school's performance is at a level that meets the annual performance measures and high quality standards in this policy.

8.4. Conditional accreditation status shall be issued to a school when the measure of the school's performance is below established standards and performance measures, but the school's Unified Improvement Plan has been revised to achieve full accreditation status by a date certain, the plan has been approved by the West Virginia Board of Education, and the school is meeting the objectives and time line in the revised plan.

8.5. Temporary accreditation status shall be issued to a school when the measure of the school's performance is below established standards and performance measures.

8.5.1. Whenever a school is issued temporary accreditation status, the county board shall ensure that the school's Unified School Improvement Plan is revised to increase the performance of the school to a full accreditation status level. The revised plan shall include objectives, a time line, a plan for evaluation of the success of the improvements, cost estimates, and a date certain for achieving full accreditation status.

8.5.2. The revised Unified School Improvement Plan shall be submitted to the West Virginia Board of Education for approval.

8.6. Seriously impaired status shall be issued to a school when the measure(s) of the school's performance is/are below the established performance measures or the West Virginia Board of Education determines that extraordinary circumstances exist.

§126-13-9. Exemplary Accreditation Status. A school shall be considered to be awarded exemplary accreditation status by the West Virginia Board of Education when all the following performance measures listed are achieved and all the high quality standards are met.

9.1. Seventy-five percent (75%) or more of the school's students in grades 3 through 11 perform at or above the 3rd quartile in total basic skills and 10 percent (10%) or fewer students perform within the 1st quartile. This performance measure will be applied until the value-added assessment approach is developed.

9.2. The student attendance rate is at or above ninety-four percent (94%) in the most recent year for which data are available.

9.3. The student dropout rate is at or less than three and six tenths percent (3.6%) in the most recent year for which data are available.

9.4. Twenty percent (20%) or more of the school's students score at or above 3 on the Writing Assessment.

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§126-13-10. Seriously Impaired Status. A school shall be considered to be seriously impaired by the West Virginia Board of Education when one or more of the following conditions exist:

10.1. The percentage of the school's students in grades 3 through 11 perform at or above the 3rd quartile in total basic skills is thirty percent (30%); and thirty percent (30%) of the students perform within the 1st quartile, unless the percentage of students performing within the 1st quartile is decreased based on two (2) of the most recent three (3) years. This performance measure will be applied until the new statewide assessment instrument is implemented. The value-added performance measures will be phased in as baseline data are available on the new statewide assessment.

10.2. The student attendance rate is at or below eighty percent (80%) in the most recent year for which data are available and one (1) of the two (2) preceding years.

10.3. The student dropout rate is at or above nine percent (9%) in the most recent year for which data are available and one (1) of the two (2) preceding years. The dropout rate is calculated according to the formula of the National Center for Education Statistics.

10.4. The school falls below the criteria for full accreditation in all three of the following performance measures: 4.1, student achievement; 4.2, student attendance; and 4.3, student dropout.

10.5. The West Virginia Board of Education may determine a school to be seriously impaired when extraordinary circumstances exist. Extraordinary circumstances are conditions that constitute major impediments to the provision of educational programs and services for students. Extraordinary circumstances shall include the following conditions.

10.5.1. The failure of a school on temporary accreditation status to obtain approval of its revised Unified School Improvement Plan within a reasonable time period as defined by the West Virginia Board of Education.

10.5.2. The failure of a school on conditional accreditation status to meet the objectives and time line in the revised plan or to achieve full accreditation by the date specified in the revised plan.

10.5.3. Extraordinary circumstances may also include the following: Physical or other abuse of students; inappropriate suspensions and/or expulsions; misappropriation of funds; misuse of public funds; falsification of reports and/or failure to submit required reports; violation of W.Va. Code and West Virginia Board of Education policies that impact the provision of an appropriate educational program; unhealthy or unsafe conditions for students and/or employees; or failure to provide a high quality and equal educational opportunity for students which can be directly attributed to deficiencies in leadership according to Section 5.12 and to the school's resources in facilities, personnel, curriculum, and/or equipment and materials. (Policy 1340)

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a. Whenever a school is seriously impaired, the West Virginia Board of Education, shall appoint a team of improvement consultants to make recommendations within sixty days of appointment for correcting the impairment.

b. Upon approval of the recommendations by the West Virginia Board of Education, the recommendations shall be made in writing to the county board. If progress in correcting the impairment is not made within six months of receipt of the recommendations, the West Virginia Board of Education shall place the county board on temporary approval status and provide consultation and assistance to the county board to (i) Improve personnel management, (ii) establish more efficient financial management practices, (iii) improve instructional programs and rules, or (iv) make such other improvements as may be necessary to correct the impairment.

c. If the school's impairment is not corrected by a date certain set by the West Virginia Board of Education, the county board shall be issued nonapproval status.

d. Whenever a school is determined to be seriously impaired and fails to improve its status within one year, any student attending such school may transfer once to the nearest fully accredited school, subject to approval of the fully accredited school and at the expense of the school from which the student transferred.

§126-13-11. School System Approval.

11.1. The West Virginia Board of Education annually shall review information submitted for each school system from the system of education performance audits and issue one of the following approval levels to each county board: Full approval, conditional approval, temporary approval, or nonapproval.

11.2. Full approval shall be issued to a county board whose educational system meets or exceeds all of the high quality standards for student, school, and school system performance and processes adopted by the West Virginia Board of Education and whose schools have all been issued full, conditional, or temporary accreditation status.

11.3. Conditional approval shall be issued to a county board whose educational system is below the level required for full approval, but whose Unified County Improvement Plan meets the following criteria: (i) the plan has been revised to achieve full approval by a date certain, (ii) the plan has been approved by the West Virginia Board of Education, and (iii) the county board is meeting the objectives and time line specified in the revised plan.

11.4. Temporary approval shall be issued to a county board whose educational system is below the level required for full approval. Whenever a county board is given temporary approval status, the county board shall revise its Unified County Improvement Plan to increase the performance of the school system to a full approval status level. The revised plan shall include objectives, a time line, a plan for evaluation of the success of the

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improvements, a cost estimate, and a date certain for achieving full approval. The revised plan shall be submitted to the West Virginia Board of Education for approval.

11.5. Nonapproval status shall be issued to a county board which fails to meet the criteria established by the West Virginia Board of Education.

§126-13-12. Nonapproval Status. A school system shall be designated as on nonapproval status when one or more of the following conditions exist:

12.1. The county board fails to submit and gain approval of its Unified County Improvement Plan.

12.2. A county board on temporary approval status fails to submit its revised Unified County Improvement Plan within thirty (30) days following written notification of the temporary approval status.

12.3. A county board on conditional approval status fails to meet the objectives and time line of its revised plan.

12.4. A county board on conditional approval status fails to achieve full approval status by the date specified in the revised plan.

12.5. The West Virginia Board of Education may issue nonapproval status to a county board when extraordinary circumstances exist. Extraordinary circumstances are conditions that constitute major impediments to the provision of education programs and services for students. Extraordinary circumstances may include: Misappropriation of funds; misuse of funds; falsification of reports and/or failure to submit required reports; violation of W.Va. Code or West Virginia Board of Education policies that impacts the provision of an appropriate educational program; unhealthy or unsafe conditions for students and/or employees; failure to provide a high quality and equal educational opportunity for students, or deficiencies in leadership according to Section 5.12. (Policy 1340)

12.6. Whenever a county board has more than a casual deficit the county board shall submit a plan to the West Virginia Board of Education specifying strategies for eliminating the casual deficit. The West Virginia Board of Education shall either approve or reject the plan. Any county board that fails to submit and gain approval for the plan before the end of the fiscal year after a deficit greater than a casual deficit occurred or any county board which fails to comply with an approved plan may be designated as having nonapproval status.

12.6.1. Whenever nonapproval status is issued to a school system, the West Virginia Board of Education shall declare a state of emergency in the school system by written notification and shall appoint a team of improvement consultants to make recommendations within sixty days of appointment for correcting the emergency.

12.6.2. Upon approval of the recommendations by the West Virginia Board of Education, the recommendations shall be made in writing to the county board. If progress

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in correcting the emergency, as determined by the West Virginia Board of Education, is not made within six months of receipt of the recommendations, the West Virginia Board of Education shall intervene in the operation of the school system to cause improvements to be made that will provide assurances that a thorough and efficient system of schools will be provided.

12.6.3. This intervention may include, but is not limited to: (i) limiting the authority of the county superintendent and county board as to the expenditure of funds, the employment and dismissal of personnel, the establishment and operation of the school calendar, the establishment of instructional programs and policies and such other areas as may be designated by the West Virginia Board of Education by rule; (ii) taking such direct action as may be necessary to correct the emergency; and (iii) declaring that the office of the county superintendent is vacant. (W.Va. Code §18-2E-5(g))

12.6.4. The West Virginia Board of Education may intervene immediately in the operation of a county school system if the West Virginia Board of Education finds the following: (1) That the conditions precedent to intervention exist as provided in this section; and (2) That delaying intervention for any period of time would not be in the best interests of the students of the county school system.

§126-13-13. On-Site Reviews.

13.1. At the direction of the West Virginia Board of Education or by weighted, random selection by the Office of Education Performance Audits, an unannounced on-site review shall be conducted by the Office of Education Performance Audits of any school or school system for purposes, including, but not limited to the following:

13.1.1. Verifying data reported by the school or county board.

13.1.2. Documenting compliance with policies and laws.

13.1.3. Evaluating the effectiveness and implementation status of school and school system Unified Improvement Plans.

13.1.4. Investigating official complaints submitted to the West Virginia Board of Education that allege serious impairments in the quality of education in schools or school systems.

13.1.5. Investigating official complaints submitted to the West Virginia Board of Education that allege that a school or county board is in violation of policies or laws under which schools and county boards operate.

13.2. Selection of schools and school systems for an on-site review shall use a weighted random sample so that those with lower performance indicators and those that have not had a recent on-site review have a greater likelihood of being selected.

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13.3. The teams shall be composed of an adequate number of persons who possess the necessary knowledge, skills, and experience to make an accurate assessment of education programs and who are drawn from a trained cadre established by the Office of Education Performance Audits. Education performance audit teams shall be made up primarily of professional personnel employed by the State who routinely perform the same functions to insure consistency in the evaluation process (contingent upon funding). The teams shall be led by a member of the Office of Education Performance Audits staff.

13.4. The Office of Education Performance Audits shall report the findings of the on-site reviews to the West Virginia Board of Education for inclusion in the evaluation and determination of a school's or county board's accreditation or approval status as applicable.

13.5. The West Virginia Board of Education encourages the sharing of information to improve school effectiveness among the county boards, multi-county vocational-technical institutes, and regional educational service agencies.

13.6. If, during an on-site review, a school or county board is found to be in noncompliance with one or more standards, the school and county Unified Improvement Plans must be revised and shall be submitted to the West Virginia Office of Education Performance Audits within thirty (30) days of receipt of the draft written report. The plans shall include objectives, a time line, a plan for evaluation of the success of the improvements, a cost estimate and a date certain for achieving full accreditation and/or full approval status as applicable.

13.7. If an acceptable plan is presented to the West Virginia Office of Education Performance Audits, the county board and school(s) shall implement the plan(s) in accordance with the date certain.

13.8. If the plan submitted to the West Virginia Office of Education Performance Audits is not acceptable, the Director of the office may return the plan for modification or has discretion to modify the plan in consultation with the county board and accept the plan as modified.

13.9. The on-site review process (a) requires the local school system to correct the deficiencies which are within its capacity to correct and (b) identifies those areas in which additional capacity is needed.

§126-13-14. Capacity Building.

14.1. Capacity building is a process for targeting resources strategically to improve the teaching and learning process. School and county Unified Improvement Plan development is intended, in part, to provide mechanisms to target resources strategically to the teaching and learning process to improve student, school, and school system performance.

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14.2. Determination will be made through the resource evaluation process regarding whether or not leadership or resources are a detrimental factor in delivery of a thorough and efficient system of education.

14.2.1. When deficiencies are detected through the assessment and accountability processes, the revision and approval of the school and county Unified Improvement Plans shall ensure that schools and school systems are efficiently using existing resources to correct the deficiencies.

14.2.2. When the West Virginia Board of Education determines that schools and school systems do not have the capacity to correct deficiencies, the West Virginia Board of Education shall work with the county board to develop or secure the resources necessary to increase the capacity of schools and school systems to meet the standards and, when necessary, seek additional resources in consultation with the Legislature and the Governor.

14.3. The West Virginia Board of Education shall recommend to the appropriate body including, but not limited to, the Legislature, county boards, schools, and communities methods for targeting resources strategically to eliminate deficiencies identified in the assessment and accountability processes by the following:

14.3.1. Examining reports and Unified Improvement Plans regarding the performance of students, schools, and school systems relative to the standards and identifying the areas in which improvement is needed;

14.3.2. Determining the areas of weakness and of ineffectiveness that appear to have contributed to the substandard performance of students or the deficiencies of the school or school system;

14.3.3. Determining the areas of strength that appear to have contributed to exceptional student, school, and school system performance and promoting their emulation throughout the system;

14.3.4. Requesting technical assistance from the School Building Authority in assessing or designing comprehensive educational facilities plans;

14.3.5. Recommending priority funding from the School Building Authority based on identified needs;

14.3.6. Requesting special staff development programs from the Center for Professional Development, higher education, regional education service agencies, and county boards based on identified needs;

14.3.7. Submitting requests to the Legislature for appropriations to meet the identified needs for improving education;

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14.3.8. Directing county boards to target their funds strategically toward alleviating deficiencies;

14.3.9. Ensuring that the need for facilities in counties with increased enrollment is appropriately reflected and recommended for funding;

14.3.10. Ensuring that the appropriate person or entity is held accountable for eliminating deficiencies; and

14.3.11. Ensuring that the needed capacity is available from the state and local level to assist the school or school system in achieving the standards and alleviating the deficiencies.

FISCAL NOTE WORKSHEET
(Submit 4 Copies)

HD NO _____ DRAFT NO _____ BILL NO _____ RESOLUTION NO _____

SUBJECT Performance Based Accreditation System (2320) FUND _____

SOURCE OF REVENUE: GENERAL FUND SPECIAL OTHER (SPECIFY) _____

COST OF ESTIMATE BASED ON: AN ORIGINAL ESTIMATE BUDGET BILL OTHER (SPECIFY) _____

INCOME ESTIMATE BASED ON: AN ORIGINAL ESTIMATE BUDGET BILL OTHER (SPECIFY) _____

SHOW OVER-ALL EFFECT IN ITEMS 1 AND 2 & GIVE EXPLANATION OF BREAKDOWN BY FISCAL YEAR INCLUDING LONG-RANGE EFFECT

EFFECT OF PROPOSAL	ANNUAL		FISCAL YEAR		
	INCREASE	DECREASE	CURRENT	NEXT	THEREAFTER
1. ESTIMATED TOTAL COST	\$1,527,993	\$0	\$0	\$1,527,993	\$1,804,393
PERSONAL SERVICES	\$670,000	\$0	\$0	\$670,000	\$703,500
CURRENT EXPENSES					
REPAIRS/ALTERATIONS					
EQUIPMENT					
OTHER	\$857,993			\$857,993	\$900,893
2. ESTIMATED TOTAL REVENUES	\$0	\$0	\$0	\$0	\$0

3. EXPLANATION OF ABOVE ESTIMATES (INCLUDING LONG-RANGE EFFECT):

This request for appropriation is in response to additional requirements of Tomblin v. Gainer Agreed Order signed August 1, 2000.

The Tomblin v. Gainer Agreed Order requirements include: 1. Implementing resource evaluation for facilities, personnel, curriculum, equipment, and materials as part of the accreditation process and 2. education performance audit teams made up primarily of professional personnel employed by the state who routinely perform the same functions in the accreditation process to insure consistency.

The minimum implementation of the resource evaluation area of the court order to routinely perform the functions in the accreditation process require the following:

1. Ten (10) professional positions;
2. Four (4) secretarial positions;
3. Office space, equipment, and furnishings;
4. Travel;
5. Training; and
6. Other operating disbursements.

DATE
11/13/00

AGENCY
West Virginia Board of Education
Office of Education Performance Audits

AUTHORIZED REPRESENTATIVE
Terma R. Seal

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: _____

Position: _____

Name of County, School, Business, etc: _____

Street Address: _____

City/State/Zip: _____

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

§126-13-5. - High Quality Standards.

§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

§126-13-8. - School Accreditation Status.

§126-13-9. - Exemplary Accreditation Status.

§126-13-10. - Seriously Impaired Status.

§126-13-11. - School System Approval.

§126-13-12. - Nonapproval Status.

§126-13-13. - On-Site Reviews.

§126-13-14. - Capacity Building.

POLICY 2320: A Process for Improving Education - Performance Based Accreditation System
COMMENT LOG

November 9, 2000 to January 11, 2001

ACTION TYPE
 N: No Response - Negative
 NA: Not Accepted + Positive
 A: Accepted o Neutral

Date	Individual/Organization	Comments	Action/Type	Rationale
§126-13-1. General				
12/6/00	Carol M. Hall, Editor, Mountain Messenger Newspaper PO Box 429 Lewisburg, WV 24901	Well thought out, clear language.	N/+	No action required.
12/20/00	Danny Kirk, Principal Ashford Rumble Elem. School HC 64 Box 540 Ashford, WV 25009	The current "Performance Based" Accreditation process is flawed in many, many ways. Basing a school's effectiveness can never be measured appropriately by using subjective standards and statistically inappropriate test data.	N/-	Required by W. Va. Code §18-2E-5.
12/20/00	Danny Kirk, Principal Ashford Rumble Elem. School	As seems par for the course, to correct the situation we raise standards, add new standards and increase the probability that more schools and county school systems will not meet the state's requirements for school accreditation. <u>Is this what we want?</u>	N/-	Not a proposed revision; therefore, not subject to action.
		It seems someone is again trying to raise the bar of success as indicated by some of the new standards in the draft copy of the new accreditation document.		

Date	Individual/Organization	Comments	Action/ Type	Rationale
12/20/00	Danny Kirk, Principal Ashford Rumble Elem. School	<p>The current and proposed performance based accreditation standards reflect achievement levels that are too high! These inflated achievement levels set individual schools and county school systems up for failure. I feel it would be better to set the standards at a lower level for accreditation purposes but still strive for higher expectations from students, schools and county school systems.</p> <p>Your title says Policy 2320 is a "Process for Improving the Education-Performance Based Accreditation System." If you are serious about improving the accreditation system, we need to look very carefully at what the system actually does to individual schools and county school systems based on the current and proposed standards.</p> <p>We Need Help!!! We Are In A Lose, Lose Situation! We're Shooting Ourselves in the Foot!</p> <p>I feel the following standards need to be revised or eliminated: (Current standards are too stringent!) Eliminate "Performance Based" from accreditation system title. Now that Marockie is gone we need to move away from our current performance based accreditation system.</p>	NA/-	Not a proposed revision; therefore, not subject to action.
			N/-	Not a proposed revision; therefore, not subject to action.
			N/-	Specified in W.Va. Code §18-2E-5; therefore, not subject to action.

Date	Individual/Organization	Comments	Action/Type	Rationale
12/20/00	<p>Danny Kirk, Principal Ashford Rumble Elem. School (Continued)</p>	<p>Everyone wants students to achieve and be successful! We all believe that "High Expectations" are important. However, we currently have standards that reflect achievement levels that are too high! These inflated achievement levels set individual schools and county school systems up for a failure. I feel it would be better to set the standards at a lower level for accreditation purposes but still strive for higher expectations for students, schools and county school systems.</p> <p>I have been a school principal for over a quarter of a century. Although I've seen positive changes over the course of my career, the "Marockie Years" have been devastating to the state's school system. It's time to take a long hard look at the WV Public School System and hopefully make some dramatic, sweeping changes. Student achievement is important, but students are more important!</p>	NA/-	<p>Not a proposed revision; therefore, not subject to action.</p> <p>Comment unrelated to proposed revisions.</p>
1/4/01	Debbie Russell	<p>It has taken much time and effort to prepare files for accreditation. Now the numbers have changed. It will take more precious time to change and prepare for the new standards which are essentially the same. Enough with the paperwork. We need to be in classrooms and working with teachers not shuffling files.</p>	N/-	<p>Comment unrelated to proposed revision.</p>

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/11/01	Dianna Buchman, Principal Ceredo Elementary School	<p>I and many principals have spent hours working on our documentation for the Performance Audit. We have files developed. Many of the changes seem to be for the purpose of changing numbers since they only have slight change in wording or no change except moving them around such as 4.14 to 5.11.6 and 5.6.2 to 5.6.10.</p> <p>I also feel that during an On-Site Performance Audit there needs to be consistency among team members. All schools should begin on a level playing field and be judged against the same standards looking for the same documentation. This does not always happen.</p>	N/-	<p>Sequence result of Tomblin v. Gainer and H.B. 4674 outlining or adding standards and W. Va. Code and State Board policy updates.</p> <p>Section 13. 3 of the policy describes this issue.</p>
1/11/01	James P. Brannon, Principal Cross Lanes Elem. School 5525 Big Tyler Road Cross Lanes, WV 25313	<p>As a principal for the past twenty-six years and having represented West Virginia as a National Distinguished Principal, I have serious concerns about Policy 2320. The documentation that is now required for an on-site review is substantial and extremely time consuming. Every documentation is required. This takes away from the time principals can serve as curriculum leaders. There is only so much time in a week and I am spending approximately seventy-five hours a week at school. This affects my ability to work with children, parents and staff in creating a caring, nurturing, safe and creative atmosphere. Surely the standards can be simplified and the documentation reduced significantly.</p>	N/-	Comment unrelated to proposed revisions.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/11/01	James P. Brannon, Principal Cross Lanes Elem. School (Continued)	This policy, along with other state policies, is causing principals to want to leave education. Good perspective principals do not want the job because of the additional paper work and responsibilities. Would you?		
1/10/01	Bonnie Ritz RESA VI 30 G. C. & P. Road Wheeling, WV 26003	When establishing the verifications for each standard, caution should be taken not to exceed the standard or create undue burden on schools or counties to meet the verification and documentation requirements.	N/-	Comment unrelated to proposed revisions.
1/12/01	Wilma Dale, Principal Marlinton Elem. School 926A Fifth Avenue Marlinton, WV 24954	Also, I'm concerned that the change in this draft policy was not better publicized along with the January 11 deadline. We were working under the assumption to meet the requirements in the first draft. I did not see nor hear of this change until last week by word of mouth. I went into the website and found this. Better communication would be appreciated.	N/-	No action required. Standard procedures were followed regarding policy revision and public comment. Proposed policy mailed to each school and placed on Office of Education Performance Audits Website and Department of Education Website.
§126-13-2. Purpose				
12/6/00	Carol M. Hall, Editor, Mountain Messenger Newspaper	Accreditation process more thorough. High standards coming back to where they need to be.	N/+	No action indicated.
12/18/00	Gayle Mills, Teacher Cranberry-Prosperity Elem. 4575 Robert C. Byrd Drive Beckley, WV 25801	1. "and capacity building to ..." is awkwardly written. 2. "standards are, at a minimum, being met - define at a <u>minimum</u> ."	N/o	1. Language specific to H.B. 4674. 2. Requirements for each standard are specified in the Training Manual and Handbook of Education Performance Audits.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/11/01	Suzann Murphy, Principal Pruntytown Elem. School Rt. 2, Box 158 Grafton, WV 26354	A clarification is needed to determine what is an "adequate level of appropriately managed resources." 2.2 - Is evaluation of needs part of the Unified Plan and if so how is it to be evaluated?	NA/o	Clarification will be included in the Training Manual and Handbook for Education Performance Audits. Not a suggestion and no action indicated.
1/11/01	Principal, Anna Jarvis Elem. Sch.	Please clarify "adequate level of appropriately managed resources". Is 2.2 part of the Unified Plan? How evaluated?	N/-	Clarification will be included in the Training Manual and Handbook for Education Performance Audits.
1/11/01	Suzann Murphy, Principal Pruntytown Elem. School	2.4.1 - Goal 1: Is there a standard for first graders to be ready? What does this mean (their six by Sept. 1)? Children are coming with personal burdens from home, more counseling services are needed to help.	NA/o	2.4.1 is one of education goals for West Virginia; therefore, not subject to revisions.
1/11/01	Anna Jarvis Elementary 5 Kindergarten Teachers	2.4.1 Goal 1. - What determines being ready?	N/o	2.4.1 is one of education goals for West Virginia; therefore, not subject to revisions.
12/20/00	Danny Kirk, Principal Ashford Rumble Elem. School	2.4.1 - Eliminate this standard - Subjective - Improbable.	N/-	2.4.1 is one of the education goals for West Virginia; therefore, not subject to revisions.
1/10/01	Anna Jarvis Elementary 6 1 st Grade Teachers 650 N. Pike Grafton, WV 26354	2.4.1 - What are the guidelines for "ready?"	N/o	2.4.1 is one of the education goals for West Virginia; therefore, not subject to revisions.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/11/01	Counselor, Anna Jarvis Elem.	2.4.1 Goal 1: Students entering first grade will be ready to learn. As the school counselor I am becoming more and more amazed at the increase in the number of at risk students entering our kindergarten classes. We need to increase the number of counselors at the elementary level (1:300 students). Children are not able to learn if they are from highly dysfunctional environments. We have to provide more preventive type programs and assistance for them and their families.	N/o	2.4.1 is one of the education goals for West Virginia; therefore, not subject to revisions.
1/10/01	Sarah Kendall, Psychologist Kanawha County Schools 200 Elizabeth St. Charleston, WV 25311	2.4.1 - The word All is self-defeating and unrealistic.	N/-	2.4.1 is one of the education goals for West Virginia; therefore, not subject to revisions.
1/11/01	Principal, Anna Jarvis Elem. Sch.	2.4.1 - Goal What does it actually mean that students entering for the first time will be ready? We need more counselors to help with emotionally disturbed children as a result of problems at home. We need smaller numbers in K & 1.	N/o	2.4.1 is one of the education goals for West Virginia; therefore, not subject to revisions.
1/11/01	Suzann Murphy, Principal Pruntytown Elem. School	2.4.2 - Goal 2: How will this be equal statewide, or county wide? Is the formula going to change?	NA/o	2.4.2 is one of education goals for West Virginia; therefore, not subject to revisions.
1/11/01	Principal, Anna Jarvis Elem. Sch.	2.4.2 - Goal 2 How will this be equal throughout the state? The formula has to change.	N/o	2.4.2 is one of the education goals for West Virginia; therefore, not subject to revisions.
1/10/01	Sarah Kendall, Psychologist Kanawha County Schools	2.4.3 - Given the current SES of our state, overall performance near the 50 th percentile might be possible. Exceeding 50 th percentile overall, may be setting ourselves up for failure.	N/o	2.4.3 is one of the education goals for West Virginia; therefore, not subject to revisions.

Date	Individual/Organization	Comments	Action/Type	Rationale
12/20/00	Danny Kirk, Principal Ashford Rumble Elem. School	2.4.3 - Eliminate this standard - Statistically Improbable.	N/-	2.4.3 is one of the education goals for West Virginia; therefore, not subject to revisions.
1/10/01	Fine Arts Team, Collins Middle 601 Jones Avenue Oak Hill, WV 25901	2.4.3 - "will show improvement" rather than "will improve by 50%" would be a more realistic statement. These are real people rather than machines.	N/-	2.4.3 is one of the education goals for West Virginia; therefore, not subject to revisions.
1/11/01	Anna Jarvis Elem. School 5 Kindergarten Teachers	2.4.3 - Goal 3. - Academic performance should be measured daily & not on a "one time" assessment.	N/o	2.4.3 is one of education goals for West Virginia; therefore, not subject to revisions.
1/11/01	Ken Beale, Principal Berkeley Co. Pikeside Learning Ctr. 2140 Winchester Pike Martinsburg, WV 25401	Goal 3 - This sounds good, but in reality is almost impossible to achieve for many low functioning students.	N/-	2.4.3 is one of the education goals for West Virginia; therefore, not subject to revisions.
1/11/01	Ken Beale, Principal Berkeley Co. Pikeside Learning Ctr.	2.4.4 - Goal 4 - Again, this sounds great. But many students need some type of modified diploma and to focus on learning vocational or other job skills programs - for them to be successful in life - Many drop out because they become frustrated at not being able to meet the rigorous demands placed on them.	N/-	2.4.4 is one of the education goals for West Virginia; therefore, not subject to revisions.
12/20/00	Danny Kirk, Principal Ashford Rumble Elem. School	2.4.4 - Eliminate or revise standard to 75% (% graduates).	N/-	2.4.4 is one of the education goals for West Virginia; therefore, not subject to revisions.
1/10/01	Special Education Teachers Collins Middle School	2.4.1 through 2.4.6 - Comment - Goals are lofty but unrealistic in light of varied abilities in individuals. Intelligent quotient scores can only change a few points (+ or -) regardless of intensive remediation or optimistic wishing. Individuals are created equal but intellectual abilities will never be.	N/-	2.4.1 - 2.4.6 are education goals for West Virginia; therefore, not subject to revisions.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/11/01	Suzann Murphy, Principal Pruntytown Elem. School	OK Is this policy being presented to the State Legislature for information so that adequate funding can be provided to meet the standards?	N/o	No response required. Proposed policy has been presented to the Legislative Oversight Commission On Education Accountability and will be presented again upon State Board approval.
§126-13-3. Responsibility				
12/6/00	Carol M. Hall, Editor, Mountain Messenger Newspaper	Assessment system excellent - covers all aspects of education. I especially "liked" 3.2.3 - "Targeting additional resources"	N/+	No response indicated.
12/8/00	Bob Harris, Wood County Schools 1210 Thirteenth St. Parkersburg, WV 26101-4198	3.2.3 - Spacing needs fixed.	N/o	Adjustment made.
1/12/01	Mary Buckhart, Counselor Musselman Middle School 8784 Winchester Avenue Bunker Hill, WV 25413	3.4 - Which "early detection and intervention programs" will the State Board "make additional. . . monetary & staff resources" to us? Berkeley County has two attendance workers - by any standard, is this number satisfactory?	N/-	Not a proposed revision; therefore, not subject to action.
12/6/00	Carol M. Hall, Editor, Mountain Messenger Newspaper	Also 3.9.4, 5 & 6 are excellent.	N/+	No response indicated.
12/20/00	Danny Kirk, Principal Ashford Rumble Elem. School	3.9.6 - Eliminate this standard. Anytime you show difference as in one school is exemplary and another is on probation, etc. you cause problems! Eliminate this standard.	N/-	Required by H.B. 4674; therefore, not subject to action.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/11/01	Wayne County Central Office Curriculum Team PO Box 70 Wayne, WV 25570	The added wording will help to ensure consistent audits and provide OEPA more credibility among LEAs. We strongly suggest this wording remain and funding be provided. As a side suggestion, counties should be provided with specific details when citations are given at the school level by the audit team. They should provide the name of the teacher and the standard found to be in noncompliance. It is difficult to address a NC with just "a student was found sleeping in class at a certain school." Any questions the audit team may have should be discussed/checked with the building level administrator before leaving the site. Many times the problem could be addressed at that time.	N/o	Comments unrelated to proposed revisions.
1/11/01	Ken Beale, Principal Berkeley Co. Pikeside Learning Ctr.	I never hear anything positive about the complete school accreditation process in talking with teachers and administrators throughout the state. This is usually the case when legislation or mandates from above are thrown upon the backs of teachers and administrators. I feel the entire process needs revamped from the ground up instead of visa versa.	N/-	Comment unrelated to proposed revisions.

Date	Individual/Organization	Comments	Action/Type	Rationale
§126-13-4. Annual Performance Measures				
1/8/01	Dianna Buchman, Principal Ceredo Elementary School	§126-13-4 - "...new students achievement standards will be applied that are based upon a value added approach...." What does this mean? I am not familiar with the term value added. How will these be measured? We have spent the years developing the base line data for STANFORD ACHIEVEMENT TEST-9 (SAT-9) and preparing students to take this test. Our IGOs are based on this test and teachers are currently using these IGOs and STANFORD ACHIEVEMENT TEST-9 (SAT-9) test results to plan instruction.	N/o	Details to be included upon data reviewed from the assessment instrument to be adopted. Administration of the new assessment and analysis of the results will guide the value added measure. The value added approach will be effective school year 2003-04 which allows a comprehensive statistical study of this approach.
12/18/00	Gayle Mills, Teacher	126-13-4 - "3. goals for schools in average scores" This phrase is not clear and implies above average or below average scores are goal exempt.	N/o	Language specified in Tomblin v. Gainer Agreed Order.
1/16/01	Frank J. Capito, Teacher Monongah Middle School	Annual Performance Measures: This adjustment of test scores for economic status of school is long overdue. Thanks for seeing the necessity.	N/+	No response indicated.
1/5/01	Russ McKeen, Asst. Prin. Short Line School HC 60, Box 170 Reader, WV 26167	Why change the numbers again? If certain standards are deleted, just delete that number. Otherwise, the state department needs to send us new folders with numbers and labels on them. This is very time consuming the way it is now.	N/o	Comment unrelated to proposed revision.
1/9/01	Joe McClung, Principal Meadow Bridge High School PO Box 10 Meadow Bridge, WV 25962	New student achievement standards need to be developed and applied immediately.	N/o	Comments unrelated to proposed revisions.

Date	Individual/Organization	Comments	Action/Type	Rationale
12/20/00	Danny Kirk, Principal Ashford-Rumble Elem. School	4.1 - Eliminate or revise this standard! Statistically improbable that 50% or more of your students will be above average! This standard should not be included in the accreditation document. Reduce the 15% in the 1 st quartile to 5%.	N/-	Comment unrelated to proposed revisions.
12/18/00	James E. Frazier, Principal Cottageville Elem. School 100 School Street Cottageville, WV 25239	4.1 - I feel the standards we now have are very realistic and are fine. They do not need changed.	N/+	Revisions regarding value added results from the Tomblin v. Gainer Agreed Order and will be effective 2003-04.
1/8/01	Sarah Kendall, Psychologist Kanawha County Schools	4.1 - This is statistically unreasonable. We need to set statistically reasonable goals such as 25% in 1 st quartile, 25% in 2 nd quartile, 25% in 3 rd quartile, 25% in 4 th quartile.	N/-	Comment unrelated to proposed revisions.
1/9/01	Joe McClung, Principal Meadow Bridge High School	4.1 - The requirement that "no more than 15% of the students perform within the 1 st quartile is a complete misapplication of fair and proper comparison of West Virginia students with a norm sample that had 25% of students in each quartile, including the first. This requirement is not mathematically sound and subjects West Virginia schools and students to unfair requirements. I have repeatedly asked WVDOE personnel to explain the requirement but have found none who can do so. Perhaps I have not found the right person yet. Where did this requirement originate? If it is not right and not fair, get rid of it!	N/-	Comment unrelated to proposed revisions; therefore, no action required.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/16/01	Frank J. Capito, Teacher Monongah Middle School	4.1 - page 5 Asking a school to perform above the fiftieth percentile in total basic skills is unrealistic and sets the school and state up for failure in the eyes of the public. Also the economic status of the school would preclude scores in the first quartile being higher than 15%. Therefore, we oppose the implementation of this change.	N/o	Comment unrelated to proposed change and not subject to action.
1/9/01	Monongah Middle School; Rebecca Absher, Teacher; Ruthanne Dean, Counselor; Carol Drake, Teacher; Anna L. Greco, Teacher; Brenda K. Moore, Teacher; Beckie Parrish, Teacher; Twyla L. Rote, Teacher; Kathy J. Starrett, Teacher; John R. Straight, Teacher; Scott Vingle, Teacher; Diana G. Zelenak, Teacher; Monongah Middle School 550 Camden Avenue Monongah, WV 26554	4.1 - page 5 Asking a school to perform above the fiftieth percentile in total basic skills is unrealistic and sets the school and state up for failure in the eyes of the public. Also the economic status of the school would preclude scores in the first quartile being higher than 15%. Therefore, we oppose the implementation of this change.	N/-	Comment unrelated to proposed revisions; therefore, not subject to action.
1/18/01	Lisa Brown, Cathy Poston, Drema Scott - Grandview Elementary	4.1 - School test score improvement should be self-evaluated rather than a blanket standard. Student achievement measures should show progress of child compared to self not others, so that socioeconomic status does not play a factor in the accreditation process.	N/-	Comment unrelated to proposed revisions; therefore, not subject to action.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/4/01	Debbie Russell	Annual performance measures. I am concerned about what the value-added approach means. Currently we have data for the SAT/9 and know where we stand. What would the value added approach mean to us? Who determines the data involved? How will this help with increasing the student scores?	N/o	Details to be included upon data reviewed from the assessment instrument to be adopted. Administration of the new assessment and analysis of the results will guide the value added measure. The value added approach will be effective school year 2003-04 which allows a comprehensive statistical study of this approach.
12/20/00	Danny Kirk, Principal Ashford Rumble Elem. School	126-13-4 - Annual Performance Measures: Value Added achievement standards should be eliminated entirely!	N/-	Required by Tomblin v. Gainer Agreed Order.
1/9/01	Brenda Francis, Principal Kellogg Elem. School	126-13-4 - "new student achievement standards will be applied that are based upon a value added approach." Value added approach is an unfamiliar term. How will these be measured?	N/o	Value added approach will be defined after the new statewide assessment is adopted and implemented. Data will undergo a statistical analysis prior to application of the value added approach. Effective date is 2003-04.
12/8/00	Bob Harris, Wood County Schools	Executive Summary: I believe the definition for value-added should have been included in the Impact section of the Executive Summary or somewhere in Policy 2320. Probably too late but I think there is a real misunderstanding of value-added. Is West Virginia using the Sanders approach as used in Tenn. or what? Some claim it will cure all ills. No matter what data is reviewed, we still have to make improvements. I would like to see all emphasis from your department is on evaluating to improve students achievement.	N/o	Value added approach will be defined after the new statewide assessment is adopted and implemented. Data will undergo a statistical analysis prior to application of the value added approach. Effective date is 2003-04.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/8/01	Terry W. Farley, Principal Coal City Elementary School PO Box 1240 Coal City, WV 25823	4.1 - Value-added achievement standard needs to be objective and not subjective in analysis.	N/o	Details to be included upon data reviewed from the assessment instrument to be adopted. Administration of the new assessment and analysis of the results will guide the value added measure. The value added approach will be effective school year 2003-04 which allows a comprehensive statistical study of this approach.
1/8/01	Robert R. Paxton, Principal Elkview Middle School 5090 N. Elk River Road Elkview, WV 25071	The Value Added Approach seems to be a good method - details are too "skimpy" to evaluate however.	N/+	Details to be included upon data reviewed from the assessment instrument to be adopted. Administration of the new assessment and analysis of the results will guide the value added measure. The value added approach will be effective school year 2003-04 which allows a comprehensive statistical study of this approach.
1/9/01	Sheila Lucento Raleigh County Schools 105 Adair St. Beckley, WV 25801	4.1 - Since we have so little knowledge of value-added approach and how it might be implemented, I disagree with this change. Many of us are also fearful that when value-added is included, the requirement for 50% of students scoring above the 50 th percentile will remain as well.	N/-	Details to be included upon data reviewed from the assessment instrument to be adopted. Administration of the new assessment and analysis of the results will guide the value added measure. The value added approach will be effective school year 2003-04 which allows a comprehensive statistical study of this approach.
1/9/01	Cora Jones Kenna Elementary School PO Box 127 Kenna, WV 25248	4.1 - A clear definition of "value added" performance measures should be given.	N/o	Details to be included upon data reviewed from the assessment instrument to be adopted. Administration of the new assessment and analysis of the results will guide the value added measure. The value added approach will be effective school year 2003-04 which allows a comprehensive statistical study of this approach.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/5/01	Pat Conaway, Principal Boone Co. Kindergarten Acad. PO Box 730 Uneda, WV 25205	The value-added approach seems to be unrealistic. Perhaps I don't understand what the expectation is.	N/-	Required by Tomblin v. Gainer; therefore, no adjustment required.
1/5/01	Stephen C. Higgins, Principal Miller Jr. High School 2 Pennsylvania Ave. Fairmont, WV 26554	"Value-Added Approach" mentioned in 126-13-4 is not defined, therefore, I am not certain how this will impact Miller Junior High School.	N/o	Details to be included upon data reviewed from the assessment instrument to be adopted. Administration of the new assessment and analysis of the results will guide the value added measure. The value added approach will be effective school year 2003-04 which allows a comprehensive statistical study of this approach.
1/11/01	Martha C. Grove, Principal Mill Creek Intermediate School 785 Winchester Avenue Bunker Hill, WV 25413	4.1 - I have a concern about the "value added" performance measures. If I understand the phrase correctly, a team of people will be projecting areas where our schools need to improve without ever have been in our schools, reviewing our current populations, etc.	N/o	Details to be included upon data reviewed from the assessment instrument to be adopted. Administration of the new assessment and analysis of the results will guide the value added measure. The value added approach will be effective school year 2003-04 which allows a comprehensive statistical study of this approach.
1/11/01	Wayne County Central Office Curriculum Team PO Box 70 Wayne, WV 25570	4.1 - The term "value-added performance measures" needs to be defined in more detail.	N/o	Details to be included upon data reviewed from the assessment instrument to be adopted. Administration of the new assessment and analysis of the results will guide the value added measure. The value added approach will be effective school year 2003-04 which allows a comprehensive statistical study of this approach.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/12/01	Mary Buckhart, Counselor Musselman Middle School	Definitely, which "new student achievement standards" are anticipated for 2003-2004? EXPLAIN "value-added approach. The current standard test contract will expire before then. If test instrument is changed, now will standards be affected??"	N/o	Details to be included upon data reviewed from the assessment instrument to be adopted. Administration of the new assessment and analysis of the results will guide the value added measure. The value added approach will be effective school year 2003-04 which allows a comprehensive statistical study of this approach.
1/11/01	Bruce Williams, President Boone County Principal Assoc. PO Box 476 Whitesville, WV 25209	It is our position that the value-added performance measures are not clearly defined and little understood. This should be removed from section 4.1.	N/-	Details to be included upon data reviewed from the assessment instrument to be adopted. Administration of the new assessment and analysis of the results will guide the value added measure. The value added approach will be effective school year 2003-04 which allows a comprehensive statistical study of this approach. Required by Tomblin v. Gainer Agreed Order; therefore, not subject to remove action.
1/11/01	Suzann Murphy, Principal Pruntytown Elem. School	What is meant by value-added approach? This needs more explanation. As for absences, there is no flexibility allowing for small children entering school for the first time. Often young students are exposed to many illness their first year.	N/o	Details to be included upon data reviewed from the assessment instrument to be adopted. Administration of the new assessment and analysis of the results will guide the value added measure. The value added approach will be effective school year 2003-04 which allows a comprehensive statistical study of this approach.
1/10/01	Carla Williamson, Principal Hayes Jr. High School 830 Strawberry Road St. Albans, WV 25177	Value Added Approach - Very positive change!	N/+	No action indicated.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/8/01	Robert R. Paxton, Principal Elkview Middle School 5090 N. Elk River Road Elkview, WV 25071	Value Approach Method needs much more definition.	N/o	Details to be included upon data reviewed from the assessment instrument to be adopted. Administration of the new assessment and analysis of the results will guide the value added measure. The value added approach will be effective school year 2003-04 which allows a comprehensive statistical study of this approach.
1/11/01	Ken Beale, Principal Berkeley Co. Pikeside Learning Ctr.	These requirements for performance measures are almost impossible for the type of school we have where 100% of our students are at risk and have scored below the 50%tile in one or more of the total basic skills areas. We are an alternative school, but not for discipline students. Our small size also makes it nearly impossible to meet the attendance rates.	N/o	Performance measures are not applied to alternative schools.
1/11/01	Anna Jarvis Principal 650 N. Pike St. Grafton, WV 26354	4.2 - Attendance rate may be hard to attain if there is an epidemic or chicken pox, etc.	N/o	Not a proposed revision; therefore, not subject to action.
1/9/01	Joe McClung, Principal	4.2 - Including bus transportation interruption is an excellent idea! Where did it come from, where has it been? If we can determine its origin, could we consider sending 4.1 to this source for reconsideration?	N/+	No response indicated.
1/11/01	Debra Berry/Shady Spring Elem. 4 th Grade Teacher	4.2 - I support the proposal to not count attendance of student absences when buses don't run. This does hurt our average and should not be counted.	N/+	No response indicated.
1/9/01	Cora Jones	4.2 - This attendance standard may be unrealistic for secondary level.	N/-	No proposed revision and subject to action.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/9/01	Rose Kessinger, Coordinator WV Department of Education	4.2 - The attendance rate for 2000-01 is 93%. Leave it at 93% instead of going backward to 92.5% and then up to 93%.	NA/o	Proposal based on data and provides opportunity for schools to implement attendance programs and interventions.
1/02/01	Joyce L. Chapman, Principal Winchester Avenue School 650 Winchester Avenue Martinsburg, WV 25401	4.2 - much more reasonable rate for attendance at 92.5%.	N/+	No response indicated.
1/3/01	Delores Ranson, Asst. Supt. Jackson County Schools PO Box 770 Ripley, WV 25271	4.2 - . . . "adjust for students excluded is a result of the . . . and school bus transportation interruptions." <i>This would be very difficult if not impossible to monitor.</i>	N/o	Directions and procedures to be developed by the West Virginia Department of Education.
12/20/00	Danny Kirk, Principal Ashford Rumble Elem. School	4.2 - Reduce the attendance rate to 85%.	NA/o	Data show that more schools are meeting the 92.5% rate.
1/8/01	Robert R. Paxton, Principal Elkview Middle School 5090 N. Elk River Road Elkview, WV 25071	4.2 - The attendance rate of 93% - please be aware the schools follows procedures and the law. <u>Students and parents in Kanawha County are not held accountable legally.</u>	N/o	No proposed revision and subject to action.
1/4/01	Debbie Russell	4.2 - Will specific requirements be developed for adjusting the attendance for safe school infractions and school bus interruptions. How will this be handled for attendance purposes?	N/o	Directions and procedures to be developed by the West Virginia Department of Education.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/8/01	Dianna Buchman, Principal Ceredo Elementary School	4.2 - "...adjusted for students as a result..." Will a method of adjustment be communicated to us from the State level, so it will be consistent state-wide? The language about the school bus transportation seems to concern some principals. I did not get the same concern that some did, therefore, the language may need to be adjusted to avoid misinterpretation.	N/o	Directions and procedures to be developed by the West Virginia Department of Education.
1/10/01	Bonnie Ritz RESA VI 30 G. C. & P. Road Wheeling, WV 26003	4.2 - The addition of an adjustment for the Productive and Safe Schools Act and school bus transportation interruptions is an improvement.	N/+	No action indicated.
1/10/01	Special Education Teachers Collins Middle School 601 Jones Avenue Oak Hill, WV 25901	4.2 - Comment - Parents are responsible for a child's attendance in school. They are the ones who should be accountable. It may be cost effective to hire in-school suspension teachers to reduce student absenteeism.	N/o	Not a proposed revision; therefore, not subject to action.
1/10/01	Randall L. Rhodes, Principal Mt. Hope Elem. School 408 Lincoln St. Mt. Hope, WV 25880	4.2 - Attendance rate is set too high. 90% is attainable.	NA/-	Data show that a higher number of schools are achieving 92.5% student attendance.
1/11/01	Ron Ray, Superintendent Jackson County Schools PO Box 770 Ripley, WV 25271	4.2 - It would be difficult to adjust for bus interruptions. I do not believe that excessive time should be utilized to determine the impact of this.	N/-	Not a proposed revision; therefore, not subject to action.
1/12/01	Mary Buckhart, Counselor Musselman Middle School	4.2 - To improve attendance rate, what statewide <u>judicial support</u> for truancies (and attendance worker staffing) can we expect from our leadership at the State level?	N/o	Not a proposed revision; therefore, not subject to action.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/8/01	Sandra Morris, Principal	4.2 - State should provide incentives for student attendance to improve if expectations are going to be 93%.	N/o	Not a proposed revision; therefore, not subject to action.
1/10/01	Fine Arts Team, Collins Middle 601 Jones Avenue Oak Hill, WV 25901	4.2. - Attendance is unrealistic. Parents are ultimately responsible for attendance.	N/o	Not a proposed revision; therefore, not subject to action.
1/18/01	Lisa Brown, Cathy Poston, Drema Scott - Grandview Elementary	4.2 - Unrealistic expectations of attendance without parental consequences in Elementary School settings. Secondary attendance policies could be achieved because a student is held accountable.	N/-	Not a proposed revision; therefore, not subject to action.
1/16/01	Robert (Pat) Mason, Asst. Supt. Mineral County Schools	4.2 - This is very difficult for a high school.	N/o	Not a proposed revision; therefore, not subject to action.
1/11/01	Ron Ray, Superintendent Jackson County Schools	4.3 - The dropout rate is too low. Six percent has been a workable standard.	NA/-	Data indicate that the dropout rate needs to be lowered to ensure dropout prevention/intervention efforts.
1/02/01	Joyce L. Chapman, Principal	4.3 - Drop out rate should remain at 6% - very difficult to maintain in high growth and transient population counties.	NA/-	Data indicate that the dropout rate needs to be lowered to ensure dropout prevention/intervention efforts.
12/20/00	Danny Kirk, Principal Ashford Rumble Elementary	4.3 - Eliminate the dropout rate standard!	NA/-	Required by W.Va. Code §18-2E-5.
1/9/01	Joe McClung, Principal	4.3 - Dropout rate should remain at 6%. Too many factors outside the school environment influence/control the dropout rate. Standards should not be raised to a higher level when the ability to control the dropout rate is not entirely within the scope and power of school personnel.	NA/-	Data indicate that the dropout rate needs to be lowered to ensure dropout prevention/intervention efforts.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/11/01	Martha C. Grove, Principal Mill Creek Intermediate School 785 Winchester Avenue Bunker Hill, WV 25413	4.3 - I believe that a 5% dropout rate is unrealistic. We are striving to assure that 50% of our students score in the top 2 quartiles on standardized tests and yet we try to keep 100% of high school students in school. We all realize, in this less than perfect society, that public high school education is not for all students. Some do better in vocational schools, or in the work place. Although we strive for these numbers, let's try to be realistic.	N/-	Not a proposed revision; therefore, not subject to action.
1/11/01	D.M. Warrenfely, Principal Burke St. School 422 W. Burke St. Martinsburg, WV 25401	4.3 - Dropout Rate - As a former high school principal, I feel that the 5% dropout rate/95% graduation rate are unrealistic goals.	N/-	Not a proposed revision; therefore, not subject to action.
1/8/01	Manny Arvon, Superintendent Berkeley County Schools 401 South Queen St. Martinsburg, WV 25401	4.3 and 4.5 - To decrease the dropout rate from 6% to 5% and a graduation rate of 95% would be unrealistic and an extremely difficult standard for Berkeley County Schools to meet. The dropout rate is a regional concern for school districts in the Eastern Panhandle and neighboring counties in Maryland and Virginia. The low unemployment rate creates numerous job opportunities for high school age students. Students make decisions to join the work force rather than complete their education.	NA/-	Data indicate that the dropout rate needs to be lowered to ensure dropout prevention/intervention efforts.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/8/01	Frank Aliveto, Deputy/Asst. Supt. Berkeley County Schools 401 South Queen St. Martinsburg, WV 25401	4.3 and 4.5 - Because of regional concerns and conditions, the 5% dropout rate and 95% graduation rate will be extremely difficult standards for Berkeley County Schools to obtain. Low unemployment and high mobility rates are just two factors that continue to deter our students from completing their public education.	N/-	Not a proposed revision; therefore, not subject to action.
1/10/01	Bonnie Ritz	4.3/4.5 - Combine the dropout rate and the graduation rate standards as they are indicators of identical measures and need not be two standards.	NA/-	Both are specified in W. Va. Code §18-2E-5.
1/11/01	D. M. Warrenfelty, Principal	4.4 - Writing Assessment goals are too strict 50% above 2.0 and 15% below 1.0% would be in line with the SAT 9 requirements.	A/-	Revised.
1/11/01	Geneve Gourley, Principal Chandler Elem. School 1900 School St. Charleston, WV 25312	Standard 4.4 requires additional responsibilities for documentation without deleting existing requirements.	N/-	Not a proposed revision; therefore, not subject to action. Writing assessment scores are provided by Department of Education.
1/10/01	Donna Burns, Dean of Students Hillsboro School HC 64 Box 399 Hillsboro, WV 24946	I believe that moving the level of acceptability on the 4 th and 8 th grade writing assessments is a good idea. I believe that expectations have been too low for too long. However I believe that you must provide teachers with the tools to accomplish this goal. Professional Development for K-4 teachers are expected to have students performing at this level without support of the students at <u>all</u> preceding grade levels.	N/o	No action indicated.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/10/01	Lois McCutcheon, Title 1 Reading Specialist, Hillsboro School HC 64 Box 399 Hillsboro, WV 24946	4.4 - I have a concern that all K-2 teachers will not be trained to teach writing before the students are assessed in grades 3-5. Teachers must have training that is consistent for all grades. Another area of concern is that the team assessing the Writing Assessment may be overly critical and have unreasonable expectations.	N/o	Not a proposed revision and subject to revision.
1/10/01	Cheryl Nelson, 3/4 Teacher Hillsboro School HC 64 Box 399 Hillsboro, WV 24946	4.4 - The proposed 50% of students at or above 2.5 is unrealistic for our student population. We do set high expectations, realistic ones, for our students. A proposed score of 2 would be more realistic and is a good average for student writing. Also, the increase/decrease in 2 of 3 years isn't looking at the same students and isn't a valid assessment.	A/-	Revised.
1/10/01	Barb Lewis, K/2 Teacher Hillsboro School HC 64 Box 399 Hillsboro, WV 24946	4.4 - To achieve what you are asking on the Writing Assessment the state will need to provide training for all K-4 teachers in the Writing Process appropriate for their levels. Classroom teachers will need to include Writer's Workshops in their schedules each day. Schools that include these things already beginning in Kindergarten are not reaching your goals. You may need to look at the scoring process. If a score of 2 is given the most, this again will be impossible to achieve. It's easy to mandate these things, but difficult to carry them out.	N/-	Not a proposed revision; therefore, not subject to action. However, adjustment has been made based on specific comments.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/3/01	Crescent Faculty Senate 205 Crescent Road Beckley, WV 25801	2.5 is an unrealistic expectation for the fourth grade writing assessment when it is subjectively scored and the present State average is 2.13.	N/-	Not a proposed revision; therefore, not subject to action. However, adjustment has been made based on specific comments.
1/11/01	James P. Brannon, Principal Cross Lanes Elem. School	As to standard 4.4, you are requiring more additional responsibilities for documentation without removing any existing time requiring documentation.	N/-	Not a proposed revision; therefore, not subject to action. Writing Assessment scores obtained from State Department of Education, Office of Assessment; therefore, additional documentation not required from the school.
1/11/01	Debra Berry/Regular Education Teacher - Fourth Grade Shady Spring Elem. School	4.4 - I feel the standard of 2.5 on the Writing Assessment Test is too high of an expectation. I teach 4 th grade and know how hard we work on writing skills. We have an excellent school and always achieve high test scores, but have never rated a 2.5 average on the writing test. Please reconsider the standard.	A/o	Revised.
1/5/01	Stephen C. Higgins, Principal	Indicator 4.4 which adds the "Writing Assessment" to the performance standards. It appears as though a score of 2, on a scale of N - 4 should be the point at which fifty percent of the students must score.	A/o	Revised.
1/11/01	Genevieve Gourley, Principal Chandler Elem. School	Standard 4.4 requires additional responsibilities for documentation without deleting existing requirements.	N/-	Not a proposed revision; therefore, not subject to action. Writing Assessment scores obtained from State Department of Education, Office of Assessment; therefore, additional documentation not required from the school.

Date	Individual/Organization	Comments	Action/Type	Rationale
12/8/00	Bob Harris, Wood County Schools	4.4 - I have never seen any data from the state that indicates how counties are doing to currently meeting this standard which makes me question whether or not the standard is written correctly? It appears to be copied statement from the quartile range report statement in a later standard.	N/o	Not a proposed revision; therefore, not subject to action.
1/11/01	R. Anne Lathen/Teacher/Parent 218 Highland Avenue Oak Hill, WV 25901	4.4 - Long ago, my experience and training as a teacher and a parent led me to believe that the writing assessment would be a far better measure of educational performance than the standardized tests now in use. If students are truly being offered a quality education that will prepare them for college and beyond, they should be able to write a well-organized paper using standard English and observing conventions of the writing language. Either this is not happening or the writing assessments are scored in a mysterious way. I have two children who are at the very top of their classes-4.0 GPA, 95 th + percentile on SAT 9, Golden Horseshoe winner, participant in Johns Hopkins Talent Search, etc. However, neither of these highly motivated students has scored above 2.5 on the writing assessment.	NA/-	Statewide assessment required by W. Va. Code §18-2E-5.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/11/01	R. Anne Lathen/Teacher/Parent 218 Highland Avenue Oak Hill, WV 25901 (Continued)	<p>At every opportunity, I have asked teachers to emphasize writing because of my concern about the writing assessment scores and what they indicate to me. What I hear is that lack of time precludes real attention to writing. Therefore, as a parent, I would like to see the standardized test (SAT 9) replaced with the writing assessment as the primary measure of performance for at least the language arts.</p> <p>As a first grade teacher, I devote a lot of time to writing, because I believe that it is important for students to learn to put their ideas on paper and because many students learn to read through writing. However, it is very frustrating to see my students struggle with the language arts portion of the SAT 9, because it is not well correlated to real writing experiences. As a teacher, I make a professional decision about what will best serve my students – learning to write or doing well on a standardized test.</p>		

Date	Individual/Organization	Comments	Action/Type	Rationale
1/11/01	R. Anne Lathen/Teacher/Parent (Continued)	<p>Given the pressure on teachers, principals, schools, and counties to produce SAT 9 scores, it is not surprising that activities more closely aligned with the standard test get the lion's share of language arts time and writing is often not given the time it deserves. Just last month, as we were being trained to use the new basic skills computer program, it was suggested that if time was short "most teachers skip the writing parts of the lessons." The message is very clear! Using the writing assessment as the primary performance measure of language arts achievement would certainly validate my position that writing is more important than the SAT 9. However, to do so without some changes would be counterproductive. The writing assessment should replace the SAT 9 as a performance indicator so teachers can devote sufficient time to writing. If students write proficiently they have demonstrated their command of the language arts. The scoring procedure needs some attention—more graders/paper, better feedback including return of the piece with a completed rubric and/or explanation of the average score, inclusion of the vast majority of language teachers in the scoring process so all affected teachers are familiar with the process and expectations.</p>		

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/11/01	R. Anne Lathen/Teacher/Parent (Continued)	<p>The proposed 50% of students scoring 2.5 or above is unrealistic, at least initially. The language used in the feedback from previous writing assessments indicates that at the 2.5 level there is substantial mastery and a few areas that need improvement. This does not sound like a minimally acceptable score as the proposed change indicates. A score of 2.0 for 50% of students is much more realistic.</p> <p>The Department of Education could and should offer on-line tutorials for students wishing to improve their own writing. We receive many offers for such expensive products, but if writing is something West Virginia values, why not make it easily available. As a parent, I would find it much more attractive than Test Best booklets!</p> <p>I will be interested to see the final version of the proposed changes and appreciate the opportunity to add my views for your consideration.</p>	A/o	Revised.
12/12/00	Samuel M. Snyder, Principal Ellen Henderson, Language Arts Instructor - Fairview Middle School	<p>4.4 - First, we are concerned about the subjective manner which the writing assessment is evaluated. Even if the same people evaluate the essays every year utilizing the analytics scale identified, there can still be differences and discrepancies in the scoring. Second, this is such a sampling of the student's writing ability, done in a short period of time, that it is not a true measure of a student's ability.</p>	N/o	Not a proposed revision; therefore, not subject to action.

Date	Individual/Organization	Comments	Action/Type	Rationale
12/12/00	Samuel M. Snyder, Principal Ellen Henderson, Language Arts Instructor - Fairview Middle School (Continued)	Third, is the fact that the results do not provide a detailed enough critique of the students work. Two or three comments are not sufficient in determining why the student scored as they did. The essay should be returned with corrections made and critiques given so the student's current language arts teacher could provide reteaching for each individual student. These detailed critiques should follow the student, language arts teacher to language arts teacher, at each grade level until the next assessment is given.		
12/12/00	Samuel M. Snyder, Principal Ellen Henderson, Language Arts Instructor - Fairview Middle School	4.4 - Because of the subjective nature, the value placed upon a small sampling of the student's writing ability, and since detailed critiques are not provided, it would be a mistake to use the results of the writing assessment as a performance standard. The assessment should be used as a diagnostic tool as they are currently being used.	NA/-	Statewide writing workshops are conducted for teachers. Schools were provided an analysis of strengths and weaknesses by student for diagnostic/instructional purposes.
12/18/00	James E. Frazier Cottageville Elementary	4.4 - Standards are set to high. Should read a minimum of 50% score at or above <u>2.0</u> . No more than 15% score at or below <u>1.0</u> .	A/-	Revised.
12/20/00	Danny Kirk, Principal Ashford Rumble Elementary	4.4 - Eliminate this standard! The writing assessment standard should not be included in the accreditation document! Subjective! Improbable! Unnecessary!	NA/-	The Writing Assessment remains one of the performance measures, but has been revised based on numerous specific comments.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/02/01	Joyce L. Chapman, Principal	4.4 - very difficult standard - many schools especially elementary schools need to focus on READING. After success occurs here, then writing will follow - 60% at 2.0 level may be reasonable	A/o	Revised.
1/3/01	W. L. Aikens, Principal Musselman Middle School 8784 Winchester Avenue Bunker Hill, WV 25413	4.4 - 50% of the 7 th grade students scoring 2.5 or above is a lofty goal considering the present state average is a little over 2 for the last 3 years. I feel that 35% at or above 2.5 would be a more reasonable goal at this time.	A/o	Revised.
1/10/01	Beth Henry, 4 th Grade Instructor Flinn Elementary School	4.4 - As a fourth grade teacher, I am alarmed at the recent news regarding setting a standard of 2.5 as an acceptable score of the Writing Assessment. To begin with, research has proven time and time again that students of higher economic standards score better on standardized tests than those of lower economic status. I teach at Flinn Elementary, which is not a Title I school, and therefore might be regarded as a higher status school. Our fourth grade average on the writing assessment, year after year, has been a solid 2.0. To "up" the expectation is, in my opinion, insulting to those of us who are working so hard to achieve a school average of 2.0! Heaven help those schools who have more struggling students than we have! Secondly, the criteria for scoring, while valid to some degree, cannot truly be objective, nor are some of the standards even developmentally appropriate for the average "young writer."	A/-	Revised.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/10/01	Beth Henry, 4 th Grade Instructor Flinn Elementary School (Continued)	Getting ten-year-olds to put their thoughts on paper in a concise manner is a difficult task. But to evaluate students on such a vast criteria while expecting <u>most</u> students to score a 2.5 is nearly an impossible task. This, I believe, puts incredible pressure on teachers and students alike, especially considering that many students at the 4 th grade level are developmentally not ready to show proficiency in completing a paragraph using complete sentences with correct capitalizing and punctuation. I don't feel that expecting the average ten-year-old to know about organization, development, sentence formation, word usage, and mechanics all under this rigid, subjective analysis is appropriate. My purpose here, other than merely to rant about why life's not fair, is to implore you to reconsider naming a standard of 2.5 on the Writing Assessment as the average score. Most of us are working as hard as we can.		
1/11/01	Dottie Bowman/Shady Spring Elem. Gifted Teacher PO Box 2009 Shady Spring, WV 25918	4.4 - I believe that all schools should be required to score at least average or 2.0 for the fourth grade writing assessment. It is a very difficult assessment tool - schools scoring above average should be considered for exemplary status.	A/o	Revised.
1/11/01	Connie Lilly/Third Grade Teacher -Shady Spring Elem.	4.4 - I have taught 4 th grade and I feel that a 2.5 requirement is expecting too much. 2.0 is an average score and I don't think we should require a score above average.	A/o	Revised.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/11/01	Patsy Hill/Third Grade Teacher Shady Spring Elem. School	4.4 - A score of 2.5 on the 4 th Grade Writing Assessment is realistic as a <u>goal</u> but not as a <u>requirement</u> .	NA/-	The Writing Assessment remains one of the performance measures, but has been revised based on numerous specific comments.
1/11/01	Tamira Stover, Special Education Teacher, 4-6th Grades Shady Spring Elem. School	4.4 - I do not think the goal set for 2.5 for the Fourth Grade Writing Assessment is realistic for Accreditation purposes. Our school is one of the best in the county and have not scored close to the goal set for accreditation. The Writing Process, to do it correctly, takes a lot of class time, which is fine if we did not have to cover all the STANFORD ACHIEVEMENT TEST-9 (SAT-9) objectives.	A/o	No suggestion provided; however, revised according to numerous specific suggestions.
1/11/01	Lorraine Fletcher, 5 th Grade Teacher -Shady Spring Elem. School	4.4 - I am responding to the 2.5 on the 4 th Grade Writing Assessment to achieve accreditation. This is setting an unrealistic requirement for students and schools to obtain. Being a 5 th grade regular education teacher, each fall I carefully examine the results of students placed in my room. I have noticed that it is extremely difficult for students to score above 2.0 - even students possessing an excellent command of the writing process. Since 2.0 is the mean, how can we expect an entire school system to be required to score higher than the mean. Since a 2.0 is very difficult to obtain, I feel this recommendation needs careful thought and revision.	A/o	No suggestion provided; however, revised according to numerous specific suggestions.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/3/01	<p>Danny W. Pettry Crescent Elem. School 205 Crescent Road Beckley, WV 25801</p>	<p>4.4 - I am very concerned about the new performance indicator 4.4 (a performance indicator on writing assessment) in the proposed policy 2320. Fifty percent (50%) of the school's students score at or above 2.5 on the Writing Assessment or show an increase in two (2) of the most recent three (3) years: and no more than fifteen percent (15%) of the school's students score below 2, or the percentage of students scoring below 2 is decreased based on two (2) of the most recent three (3) years."</p> <p>This 2.5 would be at the 50% range if the Writing Assessment had a possible high score of 5, but it doesn't. The possible high is 4. If this 2.5 out of a possible 4 was converted to percentiles, such as the SAT 9, it would be close to the 62nd. It seems feasible for 50% of our students to score above the 50th percentile on the SAT 9 (an average for grades three through six in the elementary schools) and that 50% of our fourth graders now have to score above the 62nd percentile on their Writing Assessment. Also, this new indicator would require that no more than 15% of our students score below (2.0) which is really average on a test with a</p>	A/o	No suggestion provided; however, revised according to numerous specific suggestions.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/3/01	Danny Pettry, Principal Crescent Elementary School (Continued)	<p>possible high of 4.0. This is an unrealistic requirement, especially for a test which, unlike the SAT 9, is subjectively scored.</p> <p>We will not be giving the Writing Assessment for this school year (2000 - 2001) until March so we don't know what those scores will be, but we do know that the average score for the State of WV in the fourth grade for the 1999 - 2000 school year was 2.13. If this was the average score, I would assume that 50% of the students in WV were below 2.13. What percentage of our students will be below 2.5 on this new indicator? How many excellent schools will become seriously impaired due to this indicator?</p> <p>Our school is working very hard on writing. Teachers are using computers, "Dream Writers", and writing scores across the curriculum at all grade levels to increase these scores. Nobody is more concerned about test scores than the teachers and principals who are held responsible and accountable.</p> <p>This indicator, as stated, is putting way too much pressure on fourth grade teachers and is setting schools up state wide for failure. Is this the purpose of this policy?</p>		

Date	Individual/Organization	Comments	Action/Type	Rationale
1/4/01	Deborah Williams Faculty Senate President East Fairmont Jr. High School 1 Orion Lane Fairmont, WV 26554	<p>Due to the fact that the West Virginia state average writing assessment score is below 2.0, we find that the proposal clause 4.4 in legislative rule 126CSR13 is unreasonable and unattainable. This proposal, which expects 50% of our student population to score above a 2.5 and no more than 15% below a 2.0 on the writing assessment test, is extremely unrealistic. We therefore urge you to reconsider the values involved in this clause and make them somewhat more compatible with the current state average.</p> <p>We all agree that progress and improvement is necessary but realize that it cannot happen overnight with the institution of a new policy plan. We hereby suggest either more realistic and attainable expectations or an acceptable long-term improvement plan to address, more effectively, low writing assessment scores concerns.</p>	A/o	Revised.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/4/01	Sue Hollandsworth Marlington Middle School Rt. 2, Box 52S Buckeye, WV 24924	Most of the changes seem to be relevant and necessary; however, there is one question. The addition of the Writing Assessment to the standards is a welcome addition, but seems too hasty. I feel it is unrealistic to make the benchmark at 50% of students at 2.5 or better in the first year. I think that this should be phased in over a period of years to allow for the training that teachers obviously need to make students more successful. What about beginning at 50% at 2.0 and then gradually going to 2.5 after two or three years? It is a needed standard, but at the present time I think it is unrealistic.	A/+	Revised.
1/5/01	Jane Roberts, Principal Alban Elem. School 2030 Harrison Avenue St. Albans, WV 25177	4.4 - Could support 50% of students scoring at or above <u>2.0</u> instead of <u>2.5</u> on writing assessment.	A/o	Revised.
1/5/01	Cindy Daniel, Asst. Superintendent Kanawha County Schools 200 Elizabeth St. Charleston, WV 25314	4.4 - Writing Assessment Standard is too high. A 2.0 is more reasonable. A 2.0 is an average score. Were English/LA teachers on the committee that recommended this standard?	A/o	Revised.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/8/01	Mannington Middle School Faculty Senate/English/Reading Teachers 113 Clarksburg St. Mannington, WV 26582	<p>4.4 - If one assumes that 2.0 is average for our students on the writing assessment and the standards are now to be raised to 2.5 for 50% of all students, I feel it is unreasonable and too high. While having high expectations is a good practice, I feel this is unfair to our students, who are from a rural, low economic or low income part of the county to be expected to perform at an above average level.</p> <p>The scoring on the Writing Assessment is very subjective. Many of our brightest students receive scores of two. It appears as if this is a blanket score handed out to the masses. If so, it would make sense for most students to receive this score since it indicates an average ability. Most students are average. On the other hand, in order for a student to score a 2.5 one teacher would have to evaluate a student's paper as a 2 and a second teacher would have to evaluate the paper as a 3. A score of three would indicate an above average rating - Such a large discrepancy in scoring would not occur frequently between two teachers scoring papers.</p>	A/-	No suggestion provided; however, revised according to numerous specific suggestions
1/8/01	Sandra Morris, Prin. Shoals Elem. School 100 Dutch Road Charleston, WV 25302	4.4 - A minimum of 50% of the school's students score at or above 2.5 on the Writing Assessment is too high. It should be 50% of the students score at or above 2.0.	A/o	Revised.
1/8/01	Robert R. Paxton, Principal Elkview Middle School	4.4 - The Writing Assessment should be included in the document.	N/+	No action indicated.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/8/01	Terry Farley, Principal Coal City Elem. School PO Box 1240 Coal City, WV 25823	4.4 - The criteria for this item is way to high. It would also be a better assessment if grades 6, 8, and 11 would be used. Holistic Scoring Workshop should be state funded for all teachers.	A/-	No suggestion provided; however, revised according to numerous specific suggestions.
1/8/01	Dianna Buchman, Principal Ceredo Elementary School	4.4 - The WV Writing Assessment is a good diagnostic tool. Writing is an important part of the balanced reading program and schools should be accountable. If this standard had been in effect this year, Ceredo Elementary would have met it. But I feel the consistency of the grading system from year to year would make it difficult to fairly assess meeting this standard. Grading by the adjudicators varies in strictness from year to year.	N/+	No action required.
1/10/01	Sarah Kendall, Psychologist Kanawha County Schools	4.4 - This is statistically unreasonable. We need to set statistically reasonable goals such as 25% in 1 st quartile, 25% in 2 nd quartile, 25% in 3 rd quartile, 25% in 4 th quartile.	A/-	Partially accepted.
1/9/01	Monongah Middle School & Teachers	4.4 - Setting a standard that is above average as the average-2.5 on the Writing Assessment test-is again extremely unrealistic and again sets the school and school system up for public ridicule. The current scores, particularly on the seventh-grade level, are no where near the proposed scores.	A/-	No suggestion provided; however, revised according to numerous specific suggestions.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/9/01	Donna Martin, Elem. Supervisor/ Title I Co-Director/Reading Sup. Lincoln County Schools 10 Marland Avenue Hamlin, WV 25523	4.4 - Fifty percent is too high to start in year 2001/2002. Suggestion: 2001/2002 - 50% of students score at 2.0 or above; 2002/2003 - 75% of students score at 2.0 or above; 2003/2004 - 50% of students score at 2.5 or above.	A/o	Partially accepted.
1/9/01	Bruce Williams, President	4.4 - It is our position that this standard be eliminated. We are of the opinion that the curriculum needs to be strengthened at the state level first, before implementing this standard. In addition, the Writing Assessment instrument is highly subjective and needs to be made more objective in nature.	N/-	Performance measure has been revised based on majority of suggestions and data.
1/9/01	Sheila Lucento Raleigh County Schools	4.4 - The Writing Assessment standard is too high. It is well above the state average at each grade assessed. Are we going to go into this policy with many more than half of our schools not meeting the standard?	A/-	No suggestion provided; however, revised according to numerous specific suggestions.
1/9/01	Joe McClung, Principal	4.4 - Including a test that is entirely subjectively scored and requiring a score greater than 2 by 50% of the students is not fair, since a score of 2.5 is above the 50 th percentile. This standard would require that 85% of students score at 2 or above. Since a score of 2 is the same as scoring at the 50 th percentile, it is unrealistic for us to expect 85% of students to be above this mark.	N/-	No suggestion provided; however, revised according to numerous specific suggestions.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/10/01	Bonnie Ritz	4.4 - During the past three years, the West Virginia State Writing Assessment Scores at all three grade levels (4, 7, 10) was below 2.5, the established level in standard 4.4. In 1999-2000, six counties scored at or above 2.5 in grade 10; none in grade 7; and none in grade 4. Although grade 4 had about 49 counties showing what may be called an increasing trend, only about 21 counties at grade 7 and 28 at grade 10 met the criteria. The writing assessment needs to be included in the standards, but requiring a minimum of 50% of the school's students to be at or above 2.5 and no more than 15% scoring below 2.0 needs to be reconsidered. The importance of effective writing can continue to be demonstrated using a standard requiring a minimum of 50% of students to score at or above 2.0 This would take into consideration any problems with the writing prompts or scoring issues.	A/o	Revised.
1/10/01	William W. Ingles, Principal Madison Elem. School 1426 32 nd Avenue Parkersburg, WV 26101	4.4 - My first concern is performance number 4.4 (50% of students must be assessed at 2.5 on the Writing Assessment). I feel that it should be 2.0 because the top of the scale is 4.0 and half of that is 2.0.	A/o	Revised.
1/10/01	Randall L. Rhodes, Principal	4.4 - The Writing Assessment criteria is unattainable. The Writing Assessment should not be considered as part of 2320.	NA/-	No suggestion provided; however, revised according to numerous specific suggestions.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/10/01	<p>Cross Lanes Elementary Faculty Senate 5525 Big Tyler Road Cross Lanes, WV 25313</p>	<p>The teaching cadre of Cross Lanes Elementary School commends the Office of Education Performance Audits for advancements you have initiated in our educational system. However, Policy 2320 distress us greatly. The contents of the policy and its implementations has prompted us to address our concerns in written form. As astute professionals, we constantly monitor and evaluate our classroom teaching effectiveness. We have customized our lesson plan formats and documentation techniques to our teaching styles. We have done this in order to meet the learning and developmental needs of our students and to effectively communicate with their parents or guardians how they may effectively support their child's learning at home.</p> <p>We feel that the proposed revisions in Policy 2320 are highly subjective and extremely laborious to complete. The magnitude of the documentation and the format to be employed will be immense. The time needed to complete the documentation will eliminate valuable classroom teaching time. It is not apparent to us as to how our creativity as planning teachers can be enhanced to benefit the students and the community that we serve with OEPA additional</p>	A/-	<p>Partially accepted. Re: Writing Assessment.</p> <p>Remaining comments are editorial; therefore, no action is indicated.</p>

Date	Individual/Organization	Comments	Action/Type	Rationale
1/10/01	<p>Cross Lanes Elementary Faculty Senate 5525 Big Tyler Road Cross Lanes, WV 25313 (Continued)</p>	<p>requirements for detailed documentation of performance standards. An additional area which concerns us is with the Accreditation Standard 4.4. This requires that a minimum of 50% of our fourth grade students score at or above 2.5 on the Writing Assessment, or show an increase in two of the most recent three years, etc. (Effective 2001-2002) We are not in disagreement for an assessment requirement but with the increased requirement of .5% at the elementary level. We would recommend that student progress be individually tracked from grade 4 to the assessments at grades 7 and 10. Growth will be noted and should increase at a minimum to the level of 3.0 with the tenth grade assessment. The beginning of the writing assessment required 50% of the students achieve an established score of 2.0. With the raising of the standard proposed in this document, are we to understand that the scores will be increased by .5% each year or every three years after 2002? The classroom teachers from K-4 are professionals who teach appropriate writing skills developmentally, from emergent reader/writer status from Kindergarten to 4th. Do we choose the students who enter our classrooms or the doors of our school? We can teach all of the required skills, with great diligence, but that will not necessarily ensure the students in each fourth grade will improve by .5% from the previous year. We feel that the</p>		

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/10/01	Cross Lanes Elementary Faculty Senate 5525 Big Tyler Road Cross Lanes, WV 25313 (Continued)	<p>level of 2.0 should be maintained as the base line data at the fourth level and increased by .5% at the seventh, and an additional .5% at the 10th grade.</p> <p>For Grades 4, 7, and 10, we would suggest an acknowledgment certificate for standards met or exceeded, or a certificate of improvement for schools whose students are showing improvement in two of the past three years of testing. The requirement of no more than 15% of documented with a new fourth grade school population each year?</p> <p>Teaching appropriate writing skills requires practice and is as developmental as proficiency with reading skills. Are the standards being currently raised for students at the middle school and high school level? Are standards of clarity, organization, subjective analysis, etc. weighted more for older and more experienced students? What per cent of students in middle and high school score about the 2.5 standard? We would be interested in knowing the number of perfect writing scores at the elementary and secondary levels for the past school year. Please provide us with this data.</p>		

Date	Individual/Organization	Comments	Action/Type	Rationale
1/11/01	Martha C. Grove, Principal Mill Creek Intermediate School 785 Winchester Avenue Bunker Hill, WV 25413	4.4 - Again I believe the numbers of this performance measure are unrealistic. Although we try to get all students to a "4" level on the writing assessment, we are not all writers. I believe the average from 0.0 to 4.0 is a 2.0 not a 2.5. I also believe that 50% of the school's population is too large.	NA/-	No suggestion provided; however, revised according to numerous specific suggestions.
1/11/01	Wayne County Central Office Curriculum Team	4.4 - The effective date should be no sooner than 2003-2004.	NA/o	Revised, but effective date 2001-02.
1/11/01	Anna Jarvis Elem. School 5 Kindergarten Teachers	4.4 - Unrealistic for students who are not motivated - they do not care and how do you make them care?	N/o	No suggestion provided; however, revised according to numerous specific suggestions.
1/11/01	Principal, Anna Jarvis Elem. 650 N. Pike St. Grafton, WV 26354	4.4 - We would like baseline data statewide before commenting too much on this. 2. be more realistic instead of 2.5? 1.5 instead of 2. at 15%.	A/o	Partially accepted.
1/11/01	Ron Ray, Superintendent Jackson County Schools	4.4 - Standards such as this are arbitrary and lack an understanding of the term average.	A/o	No suggestion provided; however, revised according to numerous specific suggestions.
1/11/01	Suzann Murphy, Principal Pruntytown Elem. School	4.4 - Without seeing statewide data on writing assessment I feel that this 2.5 standard is not realistic.	A/o	No suggestion provided; however, revised according to numerous specific suggestions.
1/12/01	Mary Buckhart, Counselor Musselman Middle School	4.4 - Writing Assessment standard of 2.5 is unrealistic. A more relevant measure of success in communication needs to be based on verbal performance - most students will not be "writing their way" through life.	A/-	No suggestion provided; however, revised according to numerous specific suggestions.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/11/01	Ken Beale, Principal Berkeley Co. Pikeside Learning Ctr.	4.4 - The 2.5 standard on the Writing Assessment will again be practically impossible for our students to meet.	A/o	No suggestion provided; however, revised according to numerous specific suggestions.
1/16/01	Frank J. Capito, Teacher Monongah Middle School	4.4 - Setting a standard that is above average as the average-2.5 on the Writing Assessment test-is again extremely unrealistic and again sets the school and school system up for public ridicule. The current scores, particularly on the seventh-grade level, are nowhere near the proposed scores.	A/-	No suggestion provided; however, revised according to numerous specific suggestions.
1/18/01	Lisa Brown, Cathy Poston, Drema Scott - Grandview Elementary	In reviewing proposed changes we would like for you to consider the following comments: 4.4 - Normed tests are needed raising standards. Keep score at 2.0 rather than 2.5.	A/o	Revised.
1/16/01	Robert (Pat) Mason, Asst. Supt. Mineral County Schools One Baker Place Keyser, WV 26726	4.4 - Some sort of pilot study should be done to verify these cut-off points are appropriate.	N/o	No suggestion provided; however, revised according to numerous specific suggestions and data reviewed.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/12/01	Wilma Dale, Principal Marlinton Elem. School 926A Fifth Avenue Marlinton, WV 24954	I have a concern about the change in the original draft copy of the annual performance measure 4.4 of having 50% of students score 2.5 or above on the Writing Assessment. State-wide only 33% of the 4 th grade students met this goal on the 2000 test. Only 17% of our 4 th grades met this standard. I agree that we need to improve our results; however, I feel that this standard state-wide is too demanding. We felt that we could work within the original draft of 4.4 (75% at 2.0 or above). This was much more realistic as a state-wide goal.	A/o	Partially accepted.
1/12/01	Nathalie Richardson, Teacher/Parent Marlinton Elem. School 926A Fifth Avenue Marlinton, WV 24954	4.4 - As a teacher and a parent of a past fourth grade student, I strongly feel that this test needs to be reassessed on how it is administered. It is too much pressure on a ten year old child. The test needs to be broken up into sections over 2-3 days. Many students who are proficient writers do poorly on this test due to how it is administered. Test is NOT age appropriate!	N/-	No suggestion provided; therefore, no action required.
1/12/01	Elisa J. Weber, Teacher Marlinton Elem. School 926A Fifth Avenue Marlinton, WV 24954	As a Standard's Member, I recommend the following: 1. mandatory writing workshop by 2001-2002 school year; 2. 2001-2002 50% at 2 or above; 3. 2002-2003 75% at 2 or above; 4. 2003-2004 50% at 2.5 or above (or show an increase in 2 of the most recent 3 years). No more than 15% below a 2. Phase in the above requirements (#2 - #4)	A/o	Revised.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/8/01	Bob Harris, Wood Co. Schools	4.5 - Can this be increased in WV now when other standards are not in place? Is this realistic?	N/o	No suggestion provided; therefore, no action indicated.
1/11/01	Ron Ray, Superintendent Jackson County Schools	4.5 - Since the graduation rate is the inverse of the dropout rate, and the dropout rate is set too low, the graduation rate is too high.	N/-	Graduation rate will not be applied until data are available and analyzed.
1/9/01	Joe McClung, Principal	4.5 - Keep the rate of 90% as specified by the education goals of the state of West Virginia, as indicated in 2.4.4 goal #4. We should try to be consistent when possible.	NA/o	Graduation rate will not be applied until data are available and analyzed.
1/11/01	Martha C. Grove, Principal Mill Creek Intermediate School 785 Winchester Avenue Bunker Hill, WV 25413	4.5 - The concerns I have with graduation rate are the same as for the drop-out rate. I also would like to include that these two areas seem to necessitate an either or situation - either dropout or graduate. The other options of retention and death are not included.	N/o	Both measures are required by W. Va. Code §18-2E-5.
1/12/01	Mary Buckhart, Counselor Musselman Middle School	4.5 - What factors are considered in dropout/graduation rate? Socio-economic considerations? Employment availability? Family history?	N/o	Not a proposed revision; therefore, not subject to action.
12/20/00	Danny Kirk, Principal Ashford Rumble Elem. School	4.5 - Revise graduation rate to 85% setting the standard at 95% increases the odds that schools will not meet this standard!	NA/o	Graduation rate is inverse of dropout rate and will be applied when data are available.
1/12/01	Wayne County Central Office Curriculum Team	4.5 - Increases in graduation rate should be gradual and phased in rather than going from 90% to 95%.	NA/o	Graduation rate is inverse of dropout rate and will be applied when data are available.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/11/01	Wayne County Central Office Curriculum Team	4.6 - The following wording should remain: "provided that exemption requests to obtain these maximum ratios are waived in schools where the schoolwide pupil teacher ratio does not exceed 25 to 1 in grades 1 through 6.	NA/o	Exceptions are not given for classes that exceed the maximum allowable pupil-teacher ratio per W. Va. Code. Language is irrelevant.
1/11/01	Suzann Murphy, Principal Pruntytown Elem. School	4.6 - This standard is hurting our county student enrollment count because we are turning away students to other counties to meet this standard - an allowance needs to be made for grades 1-3 or increase funding for smaller class sizes.	N/-	Established by W. Va. Code.
1/16/01	Robert (Pat) Mason, Asst. Supt. Mineral County Schools One Baker Place Keyser, WV 26726	4.6 - This has never been made clear - "Exemptions may be granted . . ." by whom?	N/o	Exemptions are not given for classes that exceed the maximum pupil-teacher ratio.
1/10/01	Fine Arts Team, Collins Middle Sch 601 Jones Avenue Oak Hill, WV 25901	4.6 - Needs to be extended to 8 th Grade (K-8).	N/o	Established by W. Va. Code.
12/6/00	Carol M. Hall, Editor	These are admirable goals, especially 4.6 - good addition - re: classroom size - LONG OVERDUE	N/+	Established by W. Va. Code.
1/10/01	Anna Jarvis Elem. School 6 1 st Grade Teachers 650 N. Pike Grafton, WV 26354	4.6.5 - Research has shown that small class (20 or less) sizes at the elem. level (K-4) improves test scores and increases learning. State aide formula should be revised <u>only</u> to county <u>CLASSROOM</u> teachers to # of students. People paid by federal funds should not be included and administrator should not be included in the teacher:student ratio.	N/-	W. Va. Code and federal regulations guide these issues.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/11/01	Anna Jarvis Principal 650 N. Pike St. Grafton, WV 26354	4.6.5 - These numbers are too great for elementary level in order to appropriately est. basics. Members determine how we keep students. We often lose students to neighboring counties.	N/-	Not a proposed revision; therefore, not subject to action.
1/11/01	Anna Jarvis Elem. School 5 Kindergarten Teachers	4.6 - 20 students per teacher is way too high especially in a county where students have almost <u>no</u> pre-school experience.	N/-	Established by W. Va. Code.
1/3/01	Delores Ranson, Asst. Supt.	This Annual Performance Measure should be moved into the area of High Quality Standards: Personnel 5.8. Also, I can not find in school law that the assignment of the principal is based on the previous year's 2 nd month enrollment report. I would believe that to meet West Virginia Code §18A-2-9, principal assignments would have to be for the current year.	NA/o	W. Va. Code §18-2E-5 presents this in the annual performance measures section.
1/12/01	Mary Buckhart, Counselor Musselman Middle School	4.7 - Why has the standard of split-grade classrooms stayed same since 1983?	N/o	Specified in W. Va. Code.
1/11/01	Ron Ray, Superintendent Jackson County Schools	4.8 - This should be moved to the Personnel Section 5.8.	N/o	W. Va. Code §18-2E-5 presents this in the annual performance measures section.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/8/01	Bob Harris, Wood Co. Schools	4.10 - We need to throw this measure out as it is written. There is no guarantee of a minimum number of respondents, which invalidates the measure. Ten respondents with one on welfare equals 90% meeting the standard. What then? A school is temporarily accredited? I personally liked the original standard but add an improving trend factor for schools if you have to.	NA/-	Performance measure defines calculation.
1/9/01	Joe McClung, Principal	4.10 - Schools are to be held responsible for student actions and decisions when the students are no longer under our guidance and control? Delete this section completely, or transfer it directly to the WVDOE. Perhaps WVDOE employees are better equipped to control the actions of high school students after graduation. Will we soon be assigned responsibility for students who are five years out of high school?	N/o	Required by W.Va. Code §18-2E-5.
1/9/01	Sheila Lucento Raleigh County Schools	4.10 - How will "responding" graduates be defined? Will a percent of students who must respond be added later? This will be an expensive undertaking for our schools and county.	N/o	No suggestion provided; therefore, no action indicated.
12/20/00	Danny Kirk, Principal Ashford Rumble Elem. School	4.10 - Eliminate this standard (Responding graduates)	NA/o	Qualifies method of calculation.

Date	Individual/Organization	Comments	Action/Type	Rationale
12/20/00	James Frazier, Principal Cottageville Elem. School	4.10 & 4.11 & 4.12 - Both need a uniform way to figure %'s. I served on one On-Site team where I asked the principal how he got 100% parent involvement. He told me if he asked any parent he counted that as parent involvement! See what I mean!	N/o	This is a local decision. Geographic location, school size, developmental levels, etc. affect methods of parent involvement and calculation. A uniform system would be inappropriate for the uniqueness and decision-making of the school.
1/8/01	Dianna Buchman, Principal Ceredo Elementary School	4.11 - "...the level of parent involvement..." We need to be given a method of calculating this percentage. No one has ever been able to give me a logical, state-wide method of calculation.	N/o	This is a local decision. Geographic location, school size, developmental levels, etc. affect methods of parent involvement and calculation. A uniform system would be inappropriate for the uniqueness and decision-making of the school.
1/8/01	Paul A. Tyson, Principal Hedgesville Elem. 88 School House Dr. Hedgesville, WV 25427	I would like to see a specific method of determining the percentage of parent involvement. What constitutes parent involvement at one school may not be utilized at another.	N/o	This is a local decision. Geographic location, school size, developmental levels, etc. affect methods of parent involvement and calculation. A uniform system would be inappropriate for the uniqueness and decision-making of the school.
1/10/01	Fine Arts Team, Collins Middle Sch	4.11 - Parent involvement of 60% is unrealistic when you consider that many homes are single parent and many times the parent is working during school hours.	N/o	Numerous types of parent involvement exist in addition to presence during school hours.
1/11/01	Wayne County Central Office Curriculum Team	4.11 - A specific and consistent method of calculating the percentage of parent involvement should be provided. When an audit team member is asked how it should be calculated, they give a vague, inconsistent response. Schools in the same county have been both cited and commended for using the same method.	N/-	This is a local decision. Geographic location, school size, developmental levels, etc. affect methods of parent involvement and calculation. A uniform system would be inappropriate for the uniqueness and decision-making of the school.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/12/01	Mary Buckhart, Counselor Musselman Middle School	4.11 - Rather than assess "parent involvement" percent a fairer question is what has school done to encourage this?	N/o	Required by W.Va. Code §18-2E-5.
12/20/00	Danny Kirk, Principal Ashford Rumble Elem. School	4.11. - Parent involvement - Reduce standard to 50% or eliminate standard entirely.	NA/o	Required by W.Va. Code §18-2E-5.
12/20/00	Danny Kirk, Principal Ashford Rumble Elem. School	4.12 - Surveys! Eliminate entirely! Our survey results have been excellent over the past 10 years! Approx. 90% satisfaction rate! However, a standard such as this should not be included for accreditation!	N/-	Required by W.Va. Code §18-2E-5.
1/8/01	Bob Harris, Wood Co. Schools	4.13 - This is really a dummying down of standards. Just because schools cannot reach the standard in reading, math and language subtests does not guarantee they will reach it with Total Basic Skills. Schools will once again fail to analyze data in individual subtests and instead work towards improvement in any number of wrong approaches. I would rather see the declining trend statement used here as well and return the standards back the way it was.	A/-	Partially accepted.
1/8/01	Yvonne Santin Special Education Director Wood County Schools 1210 Thirteenth St. Parkersburg, WV 26101	This appears to be lowering the benchmark instead of raising it . . . Using this standard would enable a school's deficits in one area to go unaddressed if other areas are high enough to compensate for the deficit. Schools need to have an improvement plan to address specific weaknesses.	A/-	Partially accepted.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/9/01	Sheila Lucento	4.13 - I agree with this change. Using total basic skills instead of reading language and math will make it much simpler to verify and many more students will be able to reach this. However, will the language in the certificate and warranty for students be changed to match?	A/+	Language in the certificate and warranty will not change.
1/9/01	Joe McClung, Principal	4.13 - This requirement is not fair. We are requiring 60% of West Virginia students to score at a level that only 50% of the students in the norm sample. This does not compute mathematically.	N/-	Comment unrelated to proposed revisions.
12/20/00	Danny Kirk, Principal Ashford Rumble Elem. School	4.13 - Eliminate this standard! (33% Graduates - 70 th %tile)	N/o	Required by W. Va. Code §18-2E-5.
1/02/01	Joyce L. Chapman, Principal	4.13 - basic skills score is better	N/+	No action indicated.
1/16/01	Teachers, Monongah Middle School	4.13 - To change the requirements for graduation to the sixtieth percentile would encourage a higher dropout rate in the high school. Again why should we always expect West Virginia students to perform above average?	N/-	Graduation rate is the inverse of dropout and would not affect it.
1/10/01	Bonnie Ritz RESA VI	4.13/4.14 - The change to total basic skills is a reasonable, positive change to the standards.	N/+	No action indicated.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/12/01	Susan Jones Marshall County Schools	4.13 & 4.14 - The total basic skills criteria seems much more reasonable to me. It is also in keeping with the standard to which we as schools are held for overall performance. I would also like to see and "increasing trend" provision included. Other concerns: It is not stated that these graduates are those tested under standard conditions. Perhaps that should be included so that we do not look at total graduates as the divisor.	A/+	Rewritten.
1/10/01	Carla Williamson, Principal Hayes Jr. High School	4.13 & 4.14 - Total Basic Skills score is much easier to work with. Often students would exceed minimum level in performance in only 2 of the 3 subtests and still exceed minimum level in Total Basic Skills. This is clear and easy to work with.	A/+	No action indicated.
1/8/01	Yvonne Santin Special Education Director	4.14 - Again, this appears to be lowering the benchmark and eliminating analysis in detail for each area of basic skills.	N/-	No suggestion provided; therefore, no action indicated.
1/8/01	Bob Harris, Wood Co. Schools	4.14 - Ditto (Recommendation 4.13)	A/-	Partially accepted.
1/8/01	Terry W. Farley, Principal	4.14 - The Presidential Physical Fitness Test was moved to 5.11.6. This was one indicator we could consistently meet. We realize the need for both 4.4 and 4.14 to be in another rated area.	N/o	No suggestion provided; therefore, no action indicated.
1/9/01	Joe McClung, Principal	4.14 - 30% would be fair, 33% does not make mathematical sense.	NA/-	Comments unrelated to proposed revisions.
1/10/01	Fine Arts Team, Collins Middle Sch.	4.14 - The percent is based on students tested, not students enrolled.	N/o	Comments unrelated to proposed revisions.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/10/01	Randall L. Rhodes, Principal	4.14 - President's Fitness Test should be eliminated as part of this process.	NA/o	Moved to 5.11.6.
1/10/01	Fine Arts Team, Collins Middle Sch.	4.15 - You cannot legislate intelligence or interest. This will encourage schools to lower standards to meet the percentage.	N/-	Comments unrelated to proposed revisions.
1/8/01	Yvonne Santin Special Education Director	4.15 - This standard should reflect different percentages at different grade levels. Also consideration should be given to having schools write some type of plan to improve the fitness rate.	N/o	Comment unrelated to this performance measure.
1/9/01	Sheila Lucento	4.15 - How will the percent enrolled in advanced placement classes be calculated? This could be difficult to achieve especially at smaller schools.	N/-	Required by H.B. 4674. Calculation will be listed in the Training Manual and Handbook for Education Performance Audits.
1/10/01	Bonnie Ritz	4.15 - Add college level classes to this standard - the percentage of students in grade 9 through 12 enrolled in advanced placement/honors classes and/or college level courses is at or above 5%.	NA/o	Required by H.B. 4674.
12/8/00	Bob Harris, Wood Co. Schools	4.15 - How is this different than tracking? Will we have enrollments of 5 in these classes while regular classes will have enrollment of 95?	N/-	Required by H.B. 4674.
12/20/00	Danny Kirk, Principal	4.15 - Eliminate this standard! (Honors classes at 5%)	NA/-	Required by H.B. 4674.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/11/01	Wayne County Central Office Curriculum Team	4.15 - We agree that the percentage of students in grades 9-12 enrolled in advanced placement and/or honors classes should be at or above 5% but would like to expand the standard to include post secondary classes that are also taken in these grades.	NA/o	Required by H.B. 4674.
1/9/01	Monongah Middle School; Rebecca Absher, Teacher; Ruthanne Dean, Counselor; Carol Drake, Teacher; Anna L. Greco, Teacher; Brenda K. Moore, Teacher; Beckie Parrish, Teacher; Twyla L. Rote, Teacher; Kathy J. Starrett, Teacher; John R. Straight, Teacher; Scott Vingle, Teacher; Diana G. Zelenak, Teacher; Monongah Middle School	Annual Performance Measures: This adjustment of test scores for economic status of school is long overdue. Thanks for seeing the necessity.	N/+	No action required.
1/11/01	Martinsburg High School	The attendance rate cannot be above 92.5% The dropout rate should stay at 6%. Berkeley County can not effectively meet these two measures on a yearly basis. The transient populations, the availability of jobs and the population growth gives us unique problems that most areas of the state do not understand.	A/o NA/o	Partially accepted. Data indicate that the proposed revision is appropriate.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/18/01	Lisa Brown, Cathy Poston, Drema Scott - Grandview Elementary	<p>Policy 2320 revisions have many of us at Grandview Elementary concerned. Due to consolidation, the dynamics of our school population has changed dramatically. Our free and reduced lunch count went from 61% to 72% this year. School population increased 11% with no additional services or resources. It is difficult to be held accountable in light of these present conditions.</p> <p>Teachers and principals are overwhelmed with paperwork for accreditation. Little time is left with parents and plan improvements. Teachers' planning time has been eroded by additional requirements to document the following: test scores, skill deficiencies for each student, how they monitor student progress, what they teach, how, when, and with whom they teach it, to whom they teach it, how and when they assess learning, when and what they reteach, when they communicate with parents, how and when School Assistance Team interventions are implemented, how and when behavior plan interventions are implemented, and how teachers correlate what they teach and reteach with WVIGOs and SAT 9 skills.</p>	N/-	No suggestion provided; therefore, no action indicated..

Date	Individual/Organization	Comments	Action/ Type	Rationale
§126-13-5. High Quality Standards				
1/3/01	Delores Ranson, Asst. Supt. Jackson County Schools PO Box 770 Ripley, WV 25271	5.1.2 - I find this standard to be written awkwardly. Are instructional goals and objectives and the mission of the school provided to the teacher and the public upon request? All teachers should have copies of the instructional goals and objectives and of the school mission....not only if they request them.	A/o	Rewritten.
12/8/00	Bob Harris, Wood County Schools 1210 Thirteenth St. Parkersburg, WV 26101-4198	5.1.3 - What does high expectations really mean?	N/o	Concept defined in Training Manual and Handbook of Education Performance Audits.
12/6/00	Carol M. Hall, Editor, Mountain Messenger Newspaper PO Box 429 Lewisburg, WV 24901	Like the inclusiveness of 126-13-5. I thought 5.1.4 and 5.1.7 were especially good, but 5.1.9 - <u>excellent</u> . This will be especially helpful to students (tho some might not like it!). It will be certainly of great value all through life. 5.1.13 is also an <u>excellent</u> idea & will help to make sure that <u>NO STUDENT</u> "falls through the cracks". <u>ALL</u> of these from 5.1.13 to 5.12.5 are just excellent.	N/+	No response indicated.
1/12/01	Mary Buckhart, Counselor Musselman Middle School	5.1.7 - If "classroom instructional time" is protected from interruption, how would rural middle school children participate in Social Studies/Science Fairs/Math Field Day, any field trip, Student Council, Yearbook, school paper, Peer Mediation, reward trips for the PROS program, etc.?	N/o	Comment unrelated to proposed revisions.

Date	Individual/Organization	Comments	Action/ Type	Rationale
12/8/00	Bob Harris, Wood County Schools	5.1.8 - I'm not sure that these policies define very many instructional strategies and techniques? Are you referring to p.17 in the IGOs, for example?	N/o	Comment unrelated to proposed revisions.
1/10/01	Carla Williamson, Principal Hayes Jr. High School	5.1.9 - Please define "appropriate class". Do not leave this to school personnel. I believe writing is appropriate in every class, but my teachers would not agree.	N/o	Appropriate class will be defined in the Training Manual and Handbook for Education Performance Audits.
1/12/01	Mary Buckhart, Counselor Musselman Middle School	5.1.9 - Faculty need to teach what they know. The geometry teacher should not be expected to know the fine points of written communication any more than the English teacher should be expected to demonstrate weight lifting techniques. Writing instruction needs to be consistent and provided by the "expert" certified to teach it.	N/o	Editorial comment. No action required.
12/18/00	Gayle Mills, Teacher Cranberry-Prosperity Elem. School 4575 Robert C. Byrd Drive Beckley, WV 25801 Raleigh County	5.1.9 - Define every appropriate class. What is taught by a teacher of writing can quickly be erased, negated, or discouraged by a teacher that has little background in writing instruction.	N/o	Appropriate class will be defined in the Training Manual and Handbook for Education Performance Audits.
1/02/01	Joyce L. Chapman, Principal Winchester Avenue School 650 Winchester Avenue Martinsburg, WV 25401 Berkeley County	5.1.9 - clearer and can be accomplished	N/+	No response indicated.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/3/01	Delores Ranson, Asst. Supt. Jackson County Schools	5.1.9 - Will the "appropriate" classes be defined in the verification statement? If not, who will define?	N/o	Appropriate class will be defined in the Training Manual and Handbook for Education Performance Audits.
1/5/01	Cindy Daniel, Asst. Superintendent Kanawha County Schools 200 Elizabeth St. Charleston, WV 25314	5.1.9 - The term "every appropriate class" is too vague. Needs to be defined.	N/o	Appropriate class will be defined in the Training Manual and Handbook for Education Performance Audits.
1/8/01	Dianna Buchman, Principal Ceredo Elementary School	5.1.9 - "Instruction in writing..." The wording was changed from throughout all programs of study, which is explicit, to in every appropriate class. Who determines which class is appropriate? Everyone's idea of what is an appropriate class is most likely different making this a difficult standard to access.	N/o	Appropriate class will be defined in the Training Manual and Handbook for Education Performance Audits.
1/10/01	Kanawha County Secondary School Principals	5.1.9 - Please define "appropriate class" and do not leave the school personnel confused with regard to what class is considered appropriate.	N/o	Appropriate class will be defined in the Training Manual and Handbook for Education Performance Audits.
1/9/01	Brenda Francis, Principal Kellogg Elem. School	5.1.9 - Instruction in writing . . ." Who determines which classes are appropriate?	N/o	Appropriate class will be defined in the Training Manual and Handbook for Education Performance Audits.
1/10/01	Rosemary Basham ,President, Midland Trail Elem. Faculty Senate 200 Terry St. Belle, WV 25015	5.1.9 - The inclusion of writing as a part of every child's weekly curriculum will help raise the writing assessment scores in fourth grade and beyond. This is a welcome addition.	N/+	No action indicated.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/10/01	Rosemary Basham, President, Midland Trail Elem. Faculty Senate	5.1.13 - Student progress needs to be clarified. Does this ? ? toward mastery of IGOs? or something else?	N/o	Clarification will be listed in the Training Manual and Handbook for Education Performance Audits.
1/8/01	Bob Harris, Wood Co. Schools	5.1.14 - Programs of study. Can we not state the changes caused by Tomblin V. Gainer stuff?	N/o	Vocational requirements are being developed, others will be listed in the Training Manual and Handbook for Education Performance Audits.
1/10/01	Fine Arts Team, Collins Middle 601 Jones Avenue Oak Hill, WV 25901	5.1.14 - Add "appropriate" to read "all appropriate programs of study"	NA/o	Required by Tomblin v. Gainer Agreed Order.
1/9/01	Cora Jones, Principal Kenna Elementary School	5.1.15 - If we remediate (reteach) according to 5.1.13 and accelerate according to 5.1.15 are we tracking students?	N/o	No suggestions provided; therefore, no action indicated.
12/20/00	Danny Kirk, Principal Ashford Rumble Elem. School	5.1.19 - Work-Based learning requirements should be eliminated!	NA/-	Comment unrelated to proposed revision.
1/9/01	Monongah Middle School & Teachers Frank J. Capito, Teacher Monongah Middle School	5.2 - The Unified County Improvement Plan and the Unified School Improvement Plan have to be completed so early that a distribution of resources based solely on the budget included in them would handicap the county and school, since it is impossible to project exactly what needs will need met during the whole school year. Thus, a reliance on these plans, usually completed in June, would seem an unwise thing to do.	N/o	Budgets are not based solely on the Unified Improvement Plans. The plans assist in combining resources from various funding areas for improvement.
12/8/00	Bob Harris, Wood County Schools	5.2.1 - Define casual deficit in terms of percent here. This is redundant sounding.	NA/o	Clarification is listed in the Training Manual and Handbook for Education Performance Audits.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/12/01	Mary Buckhart, Counselor Musselman Middle School	5.2.1 - Explain "casual deficit."	NA/o	Clarification is listed in the Training Manual and Handbook for Education Performance Audits.
1/02/01	Joyce L. Chapman, Principal	5.2.2 - good addition of school plans	N/+	No action indicated.
1/16/01	Robert (Pat) Mason, Asst. Supt. Mineral County Schools One Baker Place Keyser, WV 26726	5.2.2 - reword -instead of "based on," replace with "supports." The entire budget, e.g., transportation, etc. is not based solely on the Unified Improvement Plans.	NA/o	Language specified by Policy 2510.
12/8/00	Bob Harris, Wood County Schools	5.2.4 - Does the county distribute resources on the basis of the Unified School Improvement Plan as this reads? It needs cleaned up.	N/-	Comment unrelated to proposed revisions.
1/10/01	Special Education Teachers Collins Middle School 601 Jones Avenue Oak Hill, WV 25901	5.4 - Comment - Under other programs, Title 1 services need to be returned to all middle schools. Students who do not qualify for Special Education services are being denied academic assistance because a school must have a certain percentage of students receiving free lunch to have Title 1 programs. Middle and upper income students are not immune to the necessity for assistance in reading and math. This would seem to have the appearance of discrimination.	N/-	Comment unrelated to proposed revisions.
1/11/01	Anna Jarvis Elem. School 5 Kindergarten Teachers	5.4 - Also needed - alternative behavior setting room for students who are behavior problems in the regular classroom. Gifted program needs to be strengthened.	N/o	Comment unrelated to proposed revisions.
12/8/00	Bob Harris, Wood County Schools	5.5.1 - No system in WV can meet this standard. Will the CEFP be accepted? If so, why not state that?	N/-	Required by Tomblin v. Gainer Agreed Order.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/11/01	Clacy Williams, Executive Director School Building Authority of WV 2300 Kanawha Blvd. E. Charleston, WV 25311	<p>5.5.1 - Below is a change in Policy 2320 that I perceive is essential in assuring the delineation of responsibilities among and between agencies. Additionally, it will preclude future contention over significance of "deficiency lists" verses the priorities identified by the Authority as the greatest "needs" essential for funding. I would request that this language be added to the proposed policy changes prior to its adoption.</p> <p>"5.5.1 Facilities and equipment specified in Policy 6200, Chapters 1 through 14 are available in all schools, classrooms and other required areas. A determination will be made by using the Process for Improving Education (WV Code 18-2E-5) whether any identified deficiencies adversely impact and impair the delivery of a high quality educational program. Note: Corrective measures to be taken in response to any identified resource deficiency will of necessity be subject to the feasibility of modifying existing facilities, availability of funding, and prioritization of educational needs." This policy is in no way to be interpreted to preclude, direct or refute the authority, judgement or priorities of the School Building Authority who is statutorily responsible for prioritizing "Need" for the purpose of funding school improvements or school construction in the State of West Virginia." (Policy 6200 and Tomblin v. Gainer)"</p>	A/o	Accepted.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/11/01	Anna Jarvis Principal 650 N. Pike St. Grafton, WV 26354	5.5.1 - Does not having adequate cafeteria space qualify here. We have to have P.E. in the Commons Areas outside kindergarten classrooms.	N/o	No suggestion provided; therefore, no action indicated.
1/11/01	Suzann Murphy, Principal Pruntytown Elem. School	5.5.1 - Who determines this, will the state provide funds for corrective measures?	N/o	No suggestion provided; therefore, no action indicated.
1/5/01	Cindy Daniel, Asst. Supt. Kanawha County Schools	5.6.2 - The technology plan should not be a separate plan. Should be part of the USIP. Current plan is too cumbersome for schools.	N/-	Comment unrelated to proposed revision.
1/11/01	Anna Jarvis Principal 650 N. Pike St. Grafton, WV 26354	5.6.4 - More health services are needed to rural schools that have few/small numbers of students with no full time nurse.	N/-	Comment unrelated to proposed revision.
1/12/01	Mary Buckhart, Counselor Musselman Middle School	5.6.4 - Specify: which health services are provided?	NA/o	Health services are specified in the Training Manual and Handbook of Office of Education Performance Audits. The W. Va. Code reference presents exact section where this information may be found.
1/11/01	Suzann Murphy, Principal Pruntytown Elem. School	5.6.4 - Health services are very minimal, half a day, once a month is all my school receives. Is that considered adequate? This area too needs funding for county schools.	N/-	Comment unrelated to proposed revision.
1/10/01	Randall L. Rhodes, Principal	5.6.7 - I agree that the verification of School Report Cards is not needed.	N/+	No action indicated.
1/16/01	Robert (Pat) Mason, Asst. Supt. Mineral County Schools	5.6.7 - clarify! —what does "business vocational needs" and "vocational college offerings" mean?	N/o	A committee is developing policy on vocational requirements that will clarify these issues.
12/8/00	Bob Harris, Wood County Schools	5.6.10 - This is not a sentence. Too many ands. Make it two or more sentences.	A/o	Rewritten.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/8/01	Paul A. Tyson, II, Principal Hedgesville Elem. School 88 School House Drive Hedgesville, WV 25427	5.6.11 - A faculty senate comprised of all permanent, full-time instructional personnel employed at the school is established and functioning at each school and meets the statutory requirements.	NA/o	Current language specified in W. Va. Code §18-5A-5.
1/12/01	Mary Buckhart, Counselor Musselman Middle School	5.6.13 - Lunch is not less than 30 minutes (it is NOT the length of the usual period)	A/o	Rewritten.
1/16/01	Robert (Pat) Mason, Asst. Supt. Mineral County Schools	5.6.13 - Grievance decisions have supported a minimum of a 60-minute planning period instead of "the length of the usual class period" for schools in 90-minute block schedules.	N/o	Comment unrelated to proposed revision.
1/8/01	Sandra Morris, Principal Shoals Elem. School 100 Dutch Road Charleston, WV 25302	5.6.14 - Students unable to participate in the norm-reference tests that have an IEP or 504 Plan should not have to participate in the WV Alternate Assessment. The three day training for alternate assessment for school personnel is lost classroom time.	N/-	Required by State Board Policies 2340, 2419, and 2510.
12/8/00	Bob Harris, Wood County Schools	5.6.14 - This is so confusing. I tried to determine where we were in Wood County from the State Department Assessment Office reports and I could not determine which column corresponded to the last sentence with 10%. Add or delete something here.	A/o	Rewritten for clarification.

Date	Individual/Organization	Comments	Action/ Type	Rationale
12/12/00	Dianne Boggess, Coordinator Students Services & Assessment Wood County Schools	5.6.14 - I am unsure of the meaning of this last sentence - "Education Performance Audit teams will verify that all students are eligible for testing under non-standard conditions if the non-standard percentage of students exceeds 10 percent." If the non-standard percentage of students exceed 10 percent of what? Could this sentence mean this: If the percent of special education students tested under non-standard conditions exceeds 10 percent, then the Education Performance Audit teams will verify the eligibility of all students tested under non-standard conditions.	N/o	Rewritten for clarification.
12/18/00	Alice Tenney Belington Elem. School Rt. 2, Box 344 Belington, WV 26250	5.6.14 - The part of this I feel is unfair is "Education Performance Audit teams will verify that all students are eligible for testing under non-standard conditions if the non-standard percentage of students exceeds 10 percent." Belington Elementary School is a Mildly Mentally Disabled feeder school for two smaller elementary schools. We receive all of these children, who are not part of our attendance area and only attend our school because we have the program that the other two schools don't have.	A/-	Rewritten for clarification.

Date	Individual/Organization	Comments	Action/Type	Rationale
12/18/00	Alice Tenney Belington Elem. School (Continued)	Currently we have 20 student in our M.M.D. class, four of these students are from a smaller school out of our attendance area. Why should these students be counted as our attendance areas 10%? I think a special exemption should be made for feeder schools or those students should be counted in with the school they would attend if the M.M.D. program were available in their attendance area.		
1/5/01	Jane Roberts, Principal Alban Elem. School 2030 Harrison Avenue St. Albans, WV 25177	5.6.14 - Alternate Assessment is not necessary given the state's uniform IEP and documenting progress on individual students goals that is required.	N/o	Comment unrelated to proposed revision.
12/20/00	Danny Kirk, Principal Ashford Rumble Ele. School	5.6.15 - Skill improvement program requirement should be eliminated	NA/-	Required by Policy 2510.
12/8/00	Bob Harris, Wood County Schools	5.6.16 Why are you using reading, math, and language here for proficiency and warranty but you were using Total Basic Skills for 4.13 and 4.14? This inconsistency is of concern to me. It looks like padding the standards to achieve the result you want instead of setting the direction of where we all need to go.	N/o	Performance Measures, 4.13 and 4.14 are consistent with W. Va. Code §18-2E-5. High Quality Standard, 5.6.16 , is consistent with Policy 2510.
1/9/01	Rose Kessinger, Coordinator WV Department of Education	5.6.16 - Using reading, writing and math for the warranty is not consistent with 4.13 and 4.14 which was changed to Total Basic Skills. Leave them all reading, writing and math - that tells us more than a Total Basic Skills average.	NA/o	Performance Measures, 4.13 and 4.14 are consistent with W. Va. Code §18-2E-5. High Quality Standard, 5.6.16 , is consistent with Policy 2510.

Date	Individual/Organization	Comments	Action/Type	Rationale
12/18/00	James E. Frazier, Principal Cottageville Elem. School 100 School Street Cottageville, WV 25239	5.6.23 & 5.10.2 - We have three plans to do each year. Let's combine all these plans into 1 plan. My staff feels like every time we meet we are developing another plan. HELP!! One teacher said to me our last Faculty Senate meeting, "We are being planned to death!"	N/o	Comment unrelated to proposed revisions.
1/10/01	Mary Alice Klein, Supt. Upshur County Schools 102 Smithfield St. Buckhannon, WV 26201	5.6.25 - I wish to go on record as supporting 5.6.25 in the current version of WVBOE Policy 2320 which states "The county school system effectively participates with its assigned Regional Education Service Agency." This statement appears to be more appropriate than the recommended change.	A/o	Partially accepted. Rewritten as specified by H.B. 4674.
1/10/01	Mary Alice Klein, Supt. Upshur County Schools (Continued)	The proposed language in Standard 6.16 is very confusing and does not clarify responsibilities. It appears to shift responsibility to the school district for assessment of RESA services. This assessment occurs presently through the annual survey administered by RESA. I recommend maintaining the emphasis of utilization of RESA services rather than assessment which is already a component of the present policy.		
1/12/01	Mary Buckhart, Counselor Musselman Middle School	5.7.1 - How many hours of orientation for new Board?	N/o	Comment unrelated to proposed revision.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/3/01	Delores Ranson	<p>5.8.1 - This standard does not include providing personnel to meet the pupil teachers ratio requirement of WV §18-5-81a. The only measurable requirement of the policies referenced here is found in Policy 2510: 7.43 (B), which states that kindergarten teachers have one aide if the class enrollment exceeds ten (10) students. Adequate would need to be defined to determine compliance with this standard. Is there adequate instructional personnel when English and/or science classes, for example, have more than 30 students in grades 7-12? Is there adequate personnel in a first grade classroom when several of the twenty-five students have behavior or learning problems and there is one teacher and no aide as aide is not required for classes other than kindergarten?</p>	N/o	No suggestion provided; however, revised according to numerous specific suggestions
1/4/01	Debbie Russell	<p>5.9 - What will a beginning principal internship program entail? Is this different than mentoring? Will the principal be currently employed or work under an existing principal prior to being hired as a principal and given a school? Will specialized training be given to the administrator supervising the intern principal? How will supervising principals be chosen?</p>	N/o	Language specified by W. Va. Code.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/8/01	Dianna Buchman, Principal Ceredo Elementary School	5.9 - "...and a beginning principal internship program." How is a principal internship different from the mentoring program we now have? What will constitute an internship? Will it be before being hired as a principal or after? Will the intern work as an assistant or have a school of his or her own? There are many questions that need to be answered.	N/o	Language specified by W.Va. Code.
1/12/01	Mary Buckhart, Counselor Musselman Middle School	5.9.1 - Why remove old statement about evaluations? Why was this removed (staff development for administrators)	N/o	Specified in Tomblin v. Gainer Agreed Order.
1/9/01	Rose Kessinger, Coordinator WV Department of Education	5.9.2 - Excellence in Teaching - I cannot find this anywhere in Policy 2510. It needs to be eliminated.	A/o	Reference to Policy 2510 eliminated.
1/9/01	Joe McClung, Principal Meadow Bridge High School PO Box 10 Meadow Bridge, WV 25962	5.9.4 - Similar requirements should be implemented for teachers even though it is not required by statute.	N/o	Comment unrelated to proposed revision.
1/8/01	Paul A. Tyson, II, Principal	5.9.4 - Principals' academy. All principals meet the requirements for training through the principals' academy. Principals attending outside their contract period will be reimbursed their daily rate plus expenses.	N/o	Comment unrelated to proposed revision.
1/11/01	Principal, Anna Jarvis Elem. Sch. 650 N. Pike St. Grafton, WV 26354	5.9.6 - Principals contracts should be extended to where principals are paid for meetings they are required to attend.	N/o	Comment unrelated to proposed revision.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/11/01	Suzann Murphy, Principal Pruntytown Elem. School	5.9.6 - No other profession has to work without pay if it is a requirement. Or are we not professional?	N/o	Comment unrelated to proposed revision.
1/11/01	Suzann Murphy, Principal Pruntytown Elem. School	5.10 - Once again more help is needed if this is to be obtained.	N/o	Comment unrelated to proposed revision.
1/10/01	Sarah Kendall, Psychologist Kanawha County Board of Educ. 200 Elizabeth St. Charleston, WV 25311	5.10.3 - Counselors are expected to spend far too much time doing clerical tasks. Need State-wide mandated pupil/school psychologist ratios. Need more psychologists in State of WV.	N/o	Comment unrelated to proposed revision.
1/11/01	Principal, Anna Jarvis Elem. Sch.	5.10.3 - More counselors are needed to assist at risk students in order to have safer schools & more success academically for all students.	N/o	Comment unrelated to proposed revision.
1/11/01	Anna Jarvis Elem. School 5 Kindergarten Teachers	5.10.3 - More counselors needed!	N/o	Comment unrelated to proposed revision.
1/11/01	Suzann Murphy, Principal Pruntytown Elem. School	5.10.3 - Having a counselor half a day once a week does not meet the needs of the students. This service needs increased for students to be successful and have a safe environment.	N/-	Comment unrelated to proposed revision.
12/8/00	Bob Harris, Wood County Schools	5.10.6 - Why not require more observation connected with lesson plans rather than just a review of lesson plans more often? A review each quarter does not guarantee a change in instruction in the classroom.	NA/o	Requires change in Policy 5310.

Date	Individual/Organization	Comments	Action/Type	Rationale
12/20/00	Danny Kirk, Principal Ashford Rumble Elem. Sch.	5.10.6 - Lesson Plans - Once each semester (is enough)! In a small school it would be easy, but in a large school it would be difficult! Leave it as is! 1 time per semester.	NA/-	Data from education performance audits indicate that lesson plans require more frequent review than once each semester to strengthen instruction.
1/4/01	Debbie Russell	5.10.6 - Why is the requirement changed for the principal to comment on lesson plans from once each semester to once each quarter. With many elementary principals having no assistant and no guidance counselor it is difficult for this to be accomplished. I supervise 36 teachers with no assistance. This is one more paperwork requirement that is added to the burden.	NA/-	Data from education performance audits indicate that lesson plans require more frequent review than once each semester to strengthen instruction.
1/02/01	Joyce L. Chapman, Principal	5.10.6 - based on IGO's - not w/each IGO noted in plans - could have a long term plan to address grade level IGO's	N/-	Standard does not imply that each IGO be noted in lesson plans rather lesson plans are based on instructional goals and objectives.
1/8/01	Yvonne Santin Special Education Director Wood County Schools 1210 Thirteenth St. Parkersburg, WV 26101	5.10.6 - Reviewing lesson plans once each quarter is too much of nothing. Wouldn't it be better if principals were required to observe lesson plans of teachers who had inadequate lesson plans? This is going to require excessive amounts of time for principals to review lesson plans this frequently.	NA/-	Data from education performance audits indicate that lesson plans require more frequent review than once each semester to strengthen instruction.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/8/01	Dianna Buchman, Principal Ceredo Elementary School	5.10.6 - "...principal reviews and comments..." I have no objection to reviewing lesson plans more than once a semester. In fact, I usually do check them more often. My objection is the time it takes to comment on each one. If this changes to quarterly you are increasing the paper work and lessening the time I can be in classrooms monitoring instruction. It would be much simpler to just sign off on reviewing them with comments when they are insufficient or poorly done and maybe making full comments only one or twice a year.	NA/-	Data from education performance audits indicate that lesson plans require more frequent review than once each semester to strengthen instruction.
1/10/01	Bonnie Ritz RESA VI 30 G. C. & P. Road Wheeling, WV 26003	5.10.6 - Lesson Plans - Increasing the requirement for Principals' comments on lesson plans from each semester to each quarter is unnecessary. Each semester is adequate. Be cautious that the inclusion of lesson plans based on approved IGOs is not interpreted to mean IGOs must be listed on plans.	NA/-	Data from education performance audits indicate that lesson plans require more frequent review than once each semester to strengthen instruction.
1/11/01	Wayne County Central Office Curriculum Team PO Box 70 Wayne, WV 25570	5.10.6 - Lesson plans should be reviewed and commented on a minimum of once each semester NOT changed to once each quarter. Schools with large or less experienced staff members would get nothing done but observations, evaluations and checking lesson plans.	NA/-	Data from education performance audits indicate that lesson plans require more frequent review than once each semester to strengthen instruction.
1/11/01	Anna Jarvis Elem. School 5 Kindergarten Teachers	5.10.6 - County exceeds this goal?	N/+	No action indicated.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/8/01	Bob Harris, Wood Co. Schools	5.10.8 - Rewrite: You can have an analysis of data system prior to the opening of the school year, but I think you mean they should implement it. This is very difficult to prove during on-sites. Schools have no control over when counties share data. Can the time frame be examined to include within 10 days of the start of the school year?	N/A/o	Language specific to Policy 2510.
1/11/01	Anna Jarvis Principal 650 N. Pike St. Grafton, WV 26354	5.10.8 - We need time to analyze data.	N/o	Language specific to Policy 2510.
1/11/01	Suzann Murphy, Principal Pruntytown Elem. School	5.10.8 - Because of the school calendars, not enough time is allotted to analyze test data at the beginning of the school year. There is enough just to get school under way.	N/o	Language specific to Policy 2510.
1/11/01	Suzann Murphy, Principal	5.10.10 - SAT are very much needed and established but again no time is allotted. When there are no planning times available, the county has to spend substitute monies to provide time and there is no reimbursement from the state to meet this need.	N/o	Comment unrelated to proposed revision.
1/11/01	Anna Jarvis Principal 650 N. Pike St. Grafton, WV 26354	5.10.10 - There needs to be time to do meetings.	N/o	Comment unrelated to proposed revision.
12/8/00	Bob Harris, Wood County Schools	5.10.12 - This should be stated the same way you state STANFORD ACHIEVEMENT TEST-9 (SAT-9) data review. This statement is too global but I love that it is in here.	A/+	Rewritten.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/10/01	Carla Williamson, Principal Hayes Jr. High School	5.10.12 - I am so glad to see this requirement. The data provided by ACT and SAT is so valuable and many schools pay little or no attention to this information.	N/+	No action indicated.
1/11/01	Anna Jarvis Counselor 650 N. Pike St. Grafton, WV 26354	5.11 - Safe schools issue. This is another area that needs to be addressed regarding the increase in elementary counselors. There are so many needy students and many concern areas. One counselor/625 students is unable to properly and adequately handle the needs of the population.	N/o	Comment unrelated to proposed revision.
1/11/01	Anna Jarvis Principal 650 N. Pike St. Grafton, WV 26354	5.11 - More counselors are needed for safer schools as stated in 5.10.36.	N/o	Comment unrelated to proposed revision.
1/12/01	Mary Buckhart, Counselor Musselman Middle School	5.11 - add to and "and of staff."	A/o	Rewritten
1/12/01	Mary Buckhart, Counselor Musselman Middle School	5.11.1 - add: n and consistently enforced."	A/o	Rewritten.
12/18/00	James E. Frazier, Principal	5.11.3 - Should be stated that each school shall have a preventive discipline program in place. Leave out may include R.S.P. and peer mediation. Some schools feel they <u>MUST HAVE</u> these two programs or be in non-compliance.	NA/o	Comment unrelated to proposed revision.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/8/01	Dianna Buchman, Principal Ceredo Elementary School	5.11.3 - "A preventive discipline program..." Does this terminology mandate a Responsible Students Program and a student involvement program? We have a State validated RSP that works very well for us. Students are involved but we do not have a peer mediation program. The staff has not felt the need to develop one. This again will add to the time away from classrooms on my schedule when it is not needed.	N/o	No suggestion provided; however, revised according to numerous specific suggestions. Both programs are required by W. Va. Code §18-5A-2.
1/9/01	Rose Kessinger, Coordinator WV Department of Education	5.11.3 - Preventive Discipline and Student Involvement - The Responsible Student Program is not a preventive discipline program. This needs to be changed in code. The Respect & Protect Program is a preventive discipline program.	NA/o	Specified in W. Va. Code §18-5A-2; therefore not subject to action.
1/12/01	Mary Buckhart, Counselor Musselman Middle School	5.11.5 - Policy for disciplinary procedures, etc. needs to be the same throughout county	N/o	No suggestions provided.
1/4/01	Debbie Russell	5.11.6 - Although the PPFT is an admirable goal to shoot for, it is highly difficult to change the couch potato behavior of our students with only 45 minutes per week for PE. With current resources available this is the only time we can allot for PE. Are we in the business of training athletes or teaching students?	N/o	No suggestion provided; therefore, no action indicated.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/10/01	Rosemary Basham	5.11.6 - There needs to be a reassessment for the physical education requirements for school accreditation. There also needs to be a clear way to document and it needs to be consistent statewide. Recommendations may come from Mr. John Ray's office at the State Board of Education.	NA/o	Mr. Ray provided language for proposed revision.
1/18/01	Lisa Brown, Cathy Poston, Drema Scott - Grandview Elementary	5.11.6 - Some schools do not have adequate facilities to practice and measure physical fitness requirements, such as the mile run.	N/o	No suggestions provided.
1/16/01	Robert (Pat) Mason, Asst. Supt. Mineral County Schools One Baker Place Keyser, WV 26726	5.11.6 - This standard reads as though it applies <u>only</u> to the 2000-2001 school years.	A/o	Rewritten.
1/8/01	Yvonne Santin	5.12 - How are these to be measures, defined, or verified? Are not these covered in WVBOE 5500?	N/o	Verification will be included in the Training Manual and Handbook for Education Performance Audits.
1/16/01	Robert (Pat) Mason, Asst. Supt. Mineral County Schools One Baker Place Keyser, WV 26726	5.12; 5.12.1-5.12.5 - These standards & statements are all vague and as stated are simply up to the judgement of whoever is assessing them.	N/o	Verification will be included in the Training Manual and Handbook for Education Performance Audits.
12/8/00	Bob Harris, Wood County Schools	5.12.1 - What is the standard and how will it be measured? Don't you think central office staff should be included here somewhere in the listing of effective leadership? Many times these people are a problem in school systems.	A/o	Rewritten.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/9/01	Donna Martin, Elem. Supervisor/ Title I Co-Director/Reading Sup. Lincoln County Schools 10 Marland Avenue Hamlin, WV 25523	5.12.3, 5.12.4, 5.12.5 - In 5.12.3 education leaders are administrators and teachers. Who is the education leader in 5.12.4 and 5.12.5? Principals? Or same as in 5.12.3? Suggestion: Clarify leader in 5.12.4 and 5.12.5.	N/o	Clarification will be included in the Training Manual and Handbook of Education Performance Audits.
1/9/01	Joe McClung	5.12.4 - leader should be leaders	A/o	Rewritten.
1/12/01	Mary Buckhart, Counselor Musselman Middle School	5.12.4 - add - "collaborates with/ . . . school staff and . . ." Change "mobilizes" to "accesses"	A/o	Rewritten.
1/9/01	Joe McClung	5.12.5 - leader should be leaders	A/o	Rewritten.
1/11/01	Ken Beale, Principal Berkeley Co. Pikeside Learning Ctr.	Alternative schools that are not discipline schools need more flexibility with curriculum, instructional time and almost every other area, in order to develop innovative and exemplary programs that are models in the state and across the nation. We have a top notch program in our school, but one size shoe does not fit everyone. If we have to meet every exact standard I fear our "Thinking outside the box" school will become history. The State Board or Legislature should eliminate the inequity among Principals attending the Principals' Academy. Principals on a 261 day contract are paid their regular salary while principals like myself and others on a 210 day contract are not paid the same, but are required to attend.	N/o	No specific suggestions presented; therefore, no action indicated.

Date	Individual/Organization	Comments	Action/ Type	Rationale
§126-13-6. Indicators of Efficiency				
12/6/00	Carol M. Hall, Editor, Mountain Messenger Newspaper PO Box 429 Lewisburg, WV 24901	6.1 to 6.1.1 - Great additions. Really spells things out.	N/+	No action indicated.
1/6/01	Jane Roberts, Principal Alban Elem. School 2030 Harrison Avenue St. Albans, WV 25177	This is too vague - Individual school systems should not be responsible for utilizing RESA services when what RESA offers is of little value.	A/-	Rewritten as specified in H.B. 4674.
1/11/01	Wayne County Central Office Curriculum Team PO Box 70 Wayne, WV 25570	126-13-6 Indicators of Efficiency We feel this entire section needs more explanation and clarification.	N/o	Clarification will be included in The Training Manual and Handbook for Education Performance Audits.
1/10/01	Bonnie Ritz RESA VI 30 G. C. & P. Road Wheeling, WV 26003	Add <u>may include</u> after curriculum delivery as distance learning may not be needed nor useful and should not be a requirement. As currently written, it is required. 6.1.1 - Curriculum - Include the word <u>may</u> before "including satellite delivery and distance learning . . ."	A/o	Rewritten.
1/8/01	Dianna Buchman, Principal Ceredo Elementary School	6.1.1 - "...school conduct an annual curriculum audit..." How is a curriculum audit different from what we currently do each year with our test analysis? If it is different, we need to have training provided. Again, More paper work!	N/o	This part of current county practice to determine curriculum established.
1/9/01	Brenda Francis, Principal Kellogg Elem. School	6.1.1 - What is a curriculum audit? Will this require more paper work?	N/-	This part of current county practice to determine curriculum established.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/11/01	Anna Jarvis Elem. School 5 Kindergarten Teachers	6.1.1 - Increased technology (computers)	N/o	Suggestion not presented; therefore, no action indicated.
1/10/01	Mary Alice Klein, Superintendent Upshur County Schools	6.1.6 - As President of the West Virginia Association of School Administrators, I wish to voice a concern about the ambiguity in Standard 6.1.6 The proposed language in Standard 6.1.6 is very confusing and does not clarify responsibilities. It appears to shift responsibility to the school district for assessment of RESA services. This assessment occurs presently through the annual survey administered by RESA. I recommend maintaining the emphasis of utilization of RESA services rather than assessment which is already a component of the present policy.	A/o	Partially accepted and rewritten.
1/10/01	Carol Morgan, Executive Director RESA I 205 New River Drive Beckley, WV 25801	6.1.6 - It is our opinion that the proposed standard 6.1.6 of WV Board of Education Policy 2320 is confusing and ambiguous as written. Therefore, we recommend that the standard state: "The county school system effectively participates with its assigned Regional Education Service Agency."	A/o	Partially accepted and rewritten.
1/8/01	Charles Duffy, Executive Director RESA VIII 109 S. College St. Martinsburg, WV 25401	6.1.6 - I have concern that the new wording for standard 6.1.6 is wordy, ambiguous and confusing. I would recommend that the standard be stated in its current form: "The county school system effectively participates with its assigned Regional Education Service Agency."	A/o	Partially accepted and rewritten.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/10/01	Bonnie Ritz	6.1.6 - Standard 6.1.6 is confusing and ambiguous. It is recommended that the standard state, "The county school system effectively participates with its assigned Regional Education Service Agency."	A/o	Partially accepted and rewritten.
1/10/01	Charles Nichols, Executive Director RESA III 501 22 nd St. Dunbar, WV 25064	6.1.6 - The proposed changes reflected in standard 6.1.6 are confusing and ambiguous as written. It is difficult to determine whether it is meant to: 1) evaluate the degree to which the county system participates in RESA services; 2) let the county evaluate the services provided by their RESA or; 3) let the county suggest services for their RESA to provide. Therefore, assuming the purpose of the standard is to measure the degree to which the county system participates in RESA services, I recommend the wording remain as it was in standard 5.6.25 before the revisions: "The county school system effectively participates with its assigned Regional Education Service Agency."	A/o	Partially accepted and rewritten.
1/10/01	Rick P. Powell, Executive Director RESA II 2001 McCoy Road Huntington, WV 25701	6.1.6 - After considerable discussion with fellow RESA Executive Directors, it appears that the proposed standard 6.1.6 of WV State Board Policy 2320 is confusing and ambiguous as written. Therefore, I recommend the previous language as stated in Standard 5.6.25, "the county school system effectively participates with its assigned Regional Education Service Agency" be utilized for Standard 6.1.6.	A/o	Partially accepted and rewritten.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/8/01	Yvonne Santin Special Education Director Wood County Schools 1210 Thirteenth St. Parkersburg, WV 26101	6.1.6 - 126-13-6 - Again how are these "indicators of efficiency" to be specifically defined, measured, and verified?	N/o	Definition and verification will be included in the Training Manual and Handbook for Education Performance Audits.
1/12/01	Ronald K. Nichols, Ex. Director RESA V 2507 Ninth Avenue Parkersburg, WV 26101	It is my opinion the proposed standard 6.1.6 of WV Board of Education Policy 2320 is confusing and ambiguous as written. Therefore, I recommend that the standard state, "The county school system effectively participates with its assigned Regional Education Service Agency."	A/o	Partially accepted and rewritten.
1/12/01	Ronald Dellinger, Ex. Director RESA VII 100 Virginia Avenue Fairmont, WV 26554-3690	It is the unanimous opinion of the eight RESA Executive Directors that the proposed language in standard 6.1.6 is very confusing and ambiguous. Standard 5.6.25 in the current version of West Virginia Board of Education Policy 220 states... "The county school system effectively participates with its assigned Regional Education Service Agency." ...appears to be more appropriate. Consequently, I recommend that the language previously contained in standard 5.6.25 be substituted for the proposed language in standard 6.1.6.	A/o	Partially accepted and rewritten.

Date	Individual/Organization	Comments	Action/Type	Rationale
§126-13-7. County and School Improvement Plan Process				
12/6/00	Carol M. Hall, Editor, Mountain Messenger Newspaper PO Box 429 Lewisburg, WV 24901	7.1 Unified County Plan - I didn't see it "spelled out" who creates the PLAN? At any rate - the Plan will be invaluable by putting in writing the "identified needs & school performance" data - a good guide for future activities and as a way to measure activities or lack of some. I believe the "periodic, random & unannounced on-site reviews "is an excellent idea.	N/+	No action indicated.
1/5/01	Pat Conaway, Principal Boone Co. Kindergarten Academy PO Box 730 Uneda, WV 25205	7.1 - The September 30 th date is more appropriate for each school term than June 15 th .	A/o	Accepted.
1/9/01	Joe McClung	7.1 - SAT 9 test scores are usually known by school personnel by mid-May. This date would allow approximately three weeks for school personnel to close school and also develop plans for the next school year. Most teachers are not employed after June 7 or 8. This change is most unrealistic.	A/-	Accepted.
1/8/01	Sandra Morris, Principal Shoals Elem. School 100 Durch Road Charleston, WV 25302	7.1 and 7.2 - Dates for turning in USIP should be kept as they are.	A/o	Accepted.

Date	Individual/Organization	Comments	Action/Type	Rationale
12/12/00	Dianne Boggess, Coordinator Students Services & Assessment Wood County Schools	7.1 and 7.2 - I am also wondering if the dates to submit the USIP and UCIP mentioned in proposed sections 7.1 and 7.2, would necessitate a change in the statewide assessment program to a fall testing schedule. If as in proposed section 5.6.6 decisions are to be based on "current student date", it seems unlikely that the current spring testing schedule would allow anything but year-old student data to be used. For example, a June 15, 2001 USIP deadline would mean decisions would be based by necessity on spring 2000 test results and not on the most current test results of spring 2001. The June 15 deadline is too early for spring test results to be carefully analyzed and any "data-based decisions" made.	A/o	Accepted.
12/12/00	Roger N. Pratt, Principal White Hall Elementary School	7.1 and 7.2 - I believe the current timelines of December 31 for the UCIP and September 30 for the USIP should remain as they are at the present time. We do not receive our SAT 9 scores before the middle of May. Our school calendar ends during the first week of June. With the requirements for closing school, planned vacations for LSIC members, and teacher training activities, I believe this will be a very difficult time to successfully complete the USIP. It is going to be very difficult to meet the timelines and involve everyone in the process. School administrators will be forced to do the major writing and organization of the USIP if the proposed timelines are implemented.	A/o	Accepted.

Date	Individual/Organization	Comments	Action/Type	Rationale
12/14/00	Eleanor Grubbs-Paull, Assistant Director, General Education One Baker Place Keyser, WV 26726	Dates of June 15 and Sept. 1 (School and county dates respectively) may be "to early" to allow time for test data to be received and analyzed for goal setting (as mandated by the USI Plan process). To be meaningful to the improvement process, all data will need to be available to schools on or before June 1st. This is not the case in most counties.	A/o	Accepted.
12/18/00	Alice Tenney Belington Elem. School Rt. 2, Box 344 Belington, WV 26250	7.2 - In 7.2 of this policy, it is written that each school develops a Unified School Improvement Plan or an equivalent plan by June 15. I am on a 205-day contract. This means I work three days before the teachers come in to work in the fall, and I have two days to work after teachers leave in the spring. This year, I visited a school in Texas as part of the Reading Excellence Grant our county was fortunate to receive. As much as I enjoyed this trip, two of my contract days were used on a Saturday and Sunday that was part on this trip. When school is out for teachers this spring, my contract as principal has been fulfilled. When would I have time to complete this Unified Plan? Is your answer on my own time? On years that I do have two days after teachers, time is spent on ordering, completing paperwork for the school year, and many other end of the school year tasks.	A/o	Accepted.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/02/01	Joyce L. Chapman, Principal Winchester Avenue School 650 Winchester Avenue Martinsburg, WV 25401 Berkeley County	7.2 - June 15 th is unreasonable, much test data is not available, student populations change drastically before the next year begins, and <u>little or no</u> staff development is available at year's end. Should be left at Sept. 30th!	A/-	Accepted.
1/3/01	W. L. Aikens, Principal Musselman Middle School 8784 Winchester Avenue Bunker Hill, WV 25413	7.2 -Changing the date of the USIP from 9/30 to 6/15 is absurd. We barely get our test results by the end of May and sometimes not until early June. Therefore, when are we to have adequate time as a staff to evaluate our results and create a viable plan for the next school year? Teachers and secretaries work until approximately June 8, so do you think we actually would have time to develop a stellar plan in that short amount of time. Is the state willing to compensate teachers and staff to stay longer to complete the USIP? Does anyone in Charleston realize how many other changes are required to end a school year and now you want to add another major component. This is really a bad move!!!	A/-	Accepted.
1/8/01	Robert R. Paxton, Principal Elkview Middle School 5090 N. Elk River Road Elkview, WV 25071	The deadline of June 15 for USIP is not realistic. The test results, Effective Schools Survey etc. data is not available in time for the LSIC and faculty senate to analyze.	A/-	Accepted.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/8/01	Dianna Buchman, Principal Ceredo Elementary School	7.2 - The June 15 date for the Unified School Improvement Plan is unrealistic. We need test scores for our needs assessment so that we can review and change our plan. It would be great to have this finished and submitted by June 15 but we don't have our test scores in time to analyze them by this date let alone have the USIP revised and submitted.	A/-	No suggestion presented, but section revised according to numerous comments.
1/9/01	Brenda Francis, Principal Kellogg Elem. School	7.2 - The June 15 date for the school USIP will require a great deal more paper work to be done at one of the busiest times of the year. Doing test data analysis would be almost impossible since testing results are returned so near the end of school.	A/-	No suggestion presented, but section revised according to numerous comments.
1/9/01	Bruce Williams, President Boone County Principals Assoc.	7.1 and 7.2 - This section changes the submission dates for the Unified School Improvement Plan at the county and school level. <u>COMMENT:</u> It is our position that the current dates for submission of September 30 th for school and December 31 st for boards of education remain in place and not be changed.	A/o	Accepted.
1/9/01	Cora Jones	7.2 - Making the USIP due on June 15 could require extended contracts in some counties where principals work only 210 days. It also comes due at a time when we are finishing/closing up for the school year.	A/o	No suggestion presented, but section revised according to numerous comments.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/11/01	James P. Brannon, Principal Cross Lanes Elem. School	The standard 7.2 changes the USIP due date to June 15. Principals will not have sufficient time to review and analyze the spring test data. This also is the approximate date in which principals are required to complete a multitude of forms for our county school system. Principals should be employed during the summer to complete this task.	N/o	Suggestion not specific to proposed revision; however, section revised according to numerous comments.
1/10/01	Carla Williamson, Principal Hayes Jr. High School 830 Strawberry Road St. Albans, WV 25177	I do not believe June 15 is a realistic, or appropriate, due date for school USIPs. It is difficult for a school staff to address the administration of required SAT-9, the analysis of that data, individual educational planning, scheduling, transitioning, etc. while also experiencing staff reductions, school closures, transfers, personnel changes. While a school staff will be in the process of identifying goals based on needs assessed first semester, it would be more appropriate and effective to set an early Oct. due date so schools can utilize all end of year data.	A/-	Partially accepted.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/10/01	Kanawha County Secondary School Principals	We do not believe June 15 is a realistic date. It is difficult for a school staff to address the administration of required SAT-9 testing, analysis of the results, educational plans, scheduling, transitioning, etc. while also experiencing school closures, staff reductions, personnel changes, etc. While a school staff will be in the process of identifying needs and developing goals and target areas, it would be far more realistic and effective to have an early October due date for school USIPs. This date would allow the staff adequate time to make adjustments that reflect personnel changes and end of the year data collection.	A/o	Partially accepted.
1/10/01	Walt Ingles, Principal	7.2 - My next concern is 7.2 (schools USIP has to be completed by June 15). I feel the completion date of the USIP should remain on Sept. 30 because the June 15 th deadline falls at the end of the school year. Principals are trying to close schools in June and to have a document of this size required at the same time of the year is not reasonable. Some time we do not receive test data for grades 1 & 2 until the day before school is out for the summer. Some principals do not have a 240-day contract and do not work in the summer.	A/o	Accepted.
1/10/01	Randall L. Rhodes, Principal	The date of June 1th for the U.S.I.P. is too early.	A/o	Accepted.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/10/01	Rosemary Basham	7.1 - These timelines are unrealistic in light of the time we get back test results from SAT 9. A more realistic due date would be December 1 for the county plan.	A/o	Partially accepted.
1/10/01	Rosemary Basham	7.2 - Timeline unrealistic. A better due date would be October 1 for the school plan. This would give the staff at least a month to analyze data and develop the plan.	A/-	Partially accepted.
1/8/01	Bob Harris, Wood Co. Schools	7.1 and 7.2 - I have yet to be given a reason why these plans are due on these new dates. Our plans are developed 6 months in advance to facilitate the budget-building process. By changing the dates, our Board of Education has to set funds aside to be allocated after July 1 st for the UCIP due on September 30 th . We may not have the time to hear all school reports prior to determining the UCIP. We will manage, but there needs to be some real strong training on what the UCIP and USIP are to be in the future with these changes. Was this written to satisfy schools and counties that plan improvements only in the summer months?	A/o	No suggestion presented, action based on numerous comments.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/11/01	Martha C. Grove, Principal Mill Creek Intermediate School 785 Winchester Avenue Bunker Hill, WV 25413	7.1 and 7.2 - I understand that the Unified School Improvement Plan may be required by June 15 th or September 1 st each year rather than September 30. Although I understand the need to plan early, many of the results of testing and attendance rates, etc are not available until the end of the school year. Teachers and staff members have too many items to take care of before they leave for the summer to wait until this information is available and then edit the plan. I can not wait to require my staff to work over the summer to edit these plans and have them ready by September 1 st . I believe that September 30 th is an appropriate date.	A/o	Accepted.
1/16/01	Robert (Pat) Mason, Asst. Supt. Mineral County Schools One Baker Place Keyser, WV 26726	7.1, 7.2 - Both plans should be due to the State Nov. 1. Each county should be able to decide which comes first - the county plan or the school plan. Also the end of the year is a very bad time to be developing an improvement plan.	NA/o	The majority of comments stated that the plan submission dates remain as originally established.
1/11/01	Anna Jarvis Principal 650 N. Pike St. Grafton, WV 26354	Schools should be given time to write whatever plans are required. Teachers should not be expected to stay after hours without pay. The burden always falls on a handful.	NA/-	Editorial comment, no suggestion provided.
1/11/01	Anna Jarvis Elem. School 5 Kindergarten Teachers	Schools should be given time to write plans. Teachers should not be expected to stay afterwards without getting paid. Way too much overtime not compensated for.	NA/-	Editorial comment, no suggestion provided.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/11/01	Ron Ray, Superintendent Jackson County Schools	7.2 - No due date for School and County Unified Improvement Plans is going to be acceptable to everyone. However, counties should at least be asked and a date decided upon by a majority.	NA/o	The majority of comments stated that the plan submission dates remain as originally established.
1/11/01	Geneve Gourley, Principal Chandler Elem. School 1900 School St. Charleston, WV 25312	The standard 7.2 changes the USIP due date to June 15 th . Principals will not have sufficient time to review and analyze the spring test data. This is the approximate date in which principals are required to submit a great amount of data to our county school system. Principals should be employed during the summer to complete these assignments.	A/-	The majority of comments stated that the plan submission dates remain as originally established.
1/11/01	Suzann Murphy, Principal Pruntytown Elem. School	Schools should be given time to write this large comprehensive plan if it is to be successful and not just another duty because it is required. Again are we not professionals? We are already taking away planning time to have SAT meetings, IEP meeting and curriculum meetings there always seem to be something.	NA/-	Editorial comment, no suggestions provided.
1/11/01	Ken Beale, Principal Berkeley Co. Pikeside Learning Ctr	The School Improvement plan should be submitted every two or three years instead of annually. This is an example of how teachers and administrators get swamped with paperwork instead of teaching and being in teachers classrooms.	NA/o	Comment not related to proposed revisions; therefore, no action indicated.
1/12/01	Mary Buckhart, Counselor Musselman Middle School	7.6.1 & 7.6.2 - re Improvement Plan to be established 9/1: I don't think assessments (writing) are returned by then (from previous year)	A/o	Accepted.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/18/01	Lisa Brown, Cathy Poston, Drema Scott - Grandview Staff	7.6.2 - New due date for Unified School Improvement Plan is inadequate due to time constraints in order to analyze test scores and revise a plan. Not all schools are year round. We need additional days to plan improvement activities.	A/o	Partially accepted.
§126-13-8. School Accreditation Status				
12/6/00	Carol M. Hall, Editor, Mountain Messenger Newspaper PO Box 429 Lewisburg, WV 24901	Good.	N/+	No action required.
12/20/00	Danny Kirk, Principal Ashford Rumble Elem. School HC 64 Box 540 Ashford, WV 25009 Boone County	School accreditation status - Problems in this area! Leave out exemplary accreditation status! The states so called "Minimal" standards are difficult enough to meet! A school's accreditation status should not be made public! The accreditation process should be used to help a school or county system improve. The media uses the process to compare schools and school systems. Most of these comparisons are based on test data which is unfair. The entire system needs to be revised or eliminated! We are setting ourselves up for failure!	NA/-	Exemplary status required by H.B. 4674.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/9/01	Monongah Middle School & Teachers	Since American public schools have ideally tried to educate all the children of all the people in an equal and unbiased way, it would certainly seem a step backwards to start labeling schools as exemplary or average, making it appear as though students were getting an inferior education in some public schools, when, in reality, the status was achieved through the high economic status of the attendance area. Such an approach would surely lead to the voucher system, crippling the American education system.	NA/-	Exemplary status required by H.B. 4674.
1/10/01	Bonnie Ritz RESA VI 30 G. C. & P. Road Wheeling, WV 26003	There is no definition for full accreditation status for schools. All other definitions including exemplary are provided. The definition of full approval for the entire county is provided.	A/o	Definition included.
1/11/01	Ken Beale, Principal Berkeley Co. Pikeside Learning Ctr.	Eliminate the exemplary accreditation status. Too few schools will be able to meet the criteria.	NA/-	Exemplary accreditation status required by H.B. 4674.
1/12/01	Mary Buckhart, Counselor Musselman Middle School	8.2 - "substantially" is not a quantifying standard	N/o	Language stated in H.B. 4674.
1/12/01	Mary Buckhart, Counselor Musselman Middle School	8.3 - date certain (parameters of setting that date)?	N/o	Suggestion not provided.
§126-13-9. Exemplary Accreditation Status.				
1/3/01	Delores Ranson, Asst. Supt.	Exemplary Accreditation Status is almost impossible to meet.	A/o	Suggestion not provided; however, 9.2 and 9.3 revised as indicated by data analysis.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/10/01	Rosemary Basham	9.1 and 9.4 - Standards 9.1 and 9.4 are so high that it becomes almost impossible to reach. Would it not be more beneficial and make this standard more attractive to make it more attainable. For example 60% scoring above the 3 rd quartile and 20% scoring above 2.5 rather than 3 on the writing assessment. Schools that are doing well should be recognized for it. Maybe a consideration should be given to <u>2</u> levels of exemplary status.	NA/-	Data indicate these levels are reasonable expectations for exemplary accreditation status.
1/11/01	Martha C. Grove, Principal Mill Creek Intermediate School 785 Winchester Avenue Bunker Hill, WV 25413	9.1, 9.2, 9.3 and 9.4 - The criteria listed for exemplary schools are well above the capacity for any middle or high school to achieve. Again, I feel this policy is unrealistic in nature. In an idealistic system, these would be appropriate.	A/-	9.2 and 9.3 revised as indicated by data analysis.
12/8/00	Bob Harris, Wood County Schools 1210 Thirteenth St. Parkersburg, WV 26101-4198	9.1 - Can any school in WV attain this status or just the higher socio-economic schools? How may can reach the standard now? Very, very few! Do we need it? Is there an incentive for this rating? More money? Pat on the back?	N/-	Suggestion not provided.
1/02/01	Joyce L. Chapman, Principal Winchester Avenue School	9.1 - reasonable and obtainable	N/+	No action indicated.
1/12/01	Mary Buckhart, Counselor Musselman Middle School	9.1 - Need different standards for elem vs secondary students - easier for younger students to achieve than secondary students.	N/-	Data indicate this standard is a reasonable expectation for exemplary status.
1/12/01	Mary Buckhart, Counselor Musselman Middle School	9.2 - Attendance Rate standards should be different from elem. vs secondary schools	A/o	Partially accepted.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/02/01	Joyce L. Chapman, Principal Winchester Avenue School	9.2 - Make this attendance rate an average of 96 in the "2" most recent years - a chicken pox epidemic can drop an elementary school an entire percentile point.	A/o	Partially accepted.
1/02/01	Joyce L. Chapman, Principal Winchester Avenue School	9.4 - Totally Unreasonable - as a WV Blue Ribbon School - We have never reached this level of writing achievement. 10-12% would be more realistic and difficult to obtain.	NA/-	Data indicate this standard is a reasonable expectation for exemplary status.
1/8/01	Terry W. Farley, Principal Coal City Elementary School PO Box 1240 Coal City, WV 25823	9.4 - The standard for the writing assessment is too elevated.	N/-	Data indicate this standard is a reasonable expectation for exemplary status.
12/6/00	Carol M. Hall, Editor, Mountain Messenger Newspaper PO Box 429 Lewisburg, WV 24901	Good "measuring stick"	N/+	No action indicated.
1/02/01	Joyce L. Chapman, Principal Winchester Avenue School 650 Winchester Avenue Martinsburg, WV 25401 Berkeley County	Virtually <u>impossible</u> in growth areas!	N/-	Suggestion not presented.
1/5/01	Cindy Daniel, Asst. Superintendent Kanawha County Schools 200 Elizabeth St. Charleston, WV 25314	These standards are not reasonable for secondary schools. Attendance and dropout rate standards are too high.	A/-	Revised.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/8/01	Robert R. Paxton, Principal Elkview Middle School 5090 N. Elk River Road Elkview, WV 25071	Please check the socio-economic level of these schools. Is this for political purpose?	N/-	Editorial comment, no suggestion provided.
§126-13-10. Seriously Impaired Status				
1/8/01	Yvonne Santin Special Education Director	126-13-10 - How many schools can meet this standard? Is this attainable? Don't we already have a process for Exemplary School status?	N/-	Editorial comment, no suggestion provided.
1/9/01	Joe McClung, Principal Meadow Bridge High School	Although it has not been included as a possible change, this sentence should be changed to read "The West Virginia Board of Education SHALL determine" instead of "The West Virginia Board of Education MAY determine". The use of the word "may" indicates that there is a possibility that a school has a chance of not being labeled "seriously impaired, when, in actuality, this chance does not exist. It leads to false hope on the part of principals, teachers and students that consideration will be seriously given to not impose the label of "seriously impaired". (Review of the minutes of the State Board of Education will verify that the above statement is factual).	N/-	Language specified by W.Va. Code §18-2E-5.
1/8/01	Sarah Kendall, Psychologist Kanawha County Schools 200 Elizabeth St. Charleston, WV 25311	10.1 - Seriously impaired status needs to take SES, consistency in schooling, etc. . . . into consideration. All schools, students, families, communities, i.e. are not created equal. Such inequities are frequently exhibited in test scores & schools unfairly punished.	N/-	Editorial comment, no suggestion provided.

Date	Individual/Organization	Comments	Action/ Type	Rationale
1/9/01	Joe McClung, Principal Meadow Bridge High School	(Prior to the beginning). This is confusing. Are teachers expected to perform this analysis before they start to work each year? Perhaps this should read "before the beginning of school for students".	N/o	Language specified by Policy 2510.
1/9/01	Joe McClung	Not only is it an unsound educational procedure , to label any school, principal, teacher or student " seriously impaired ", borders on being a severe injustice, if not a " crime ".	N/-	Editorial comment, no suggestion provided.
1/9/01	Joe McClung	If a school falls below standards, it is labeled " seriously impaired ". If a county does not measure up to standards, it is given a " nonapproval status ". It is grossly unfair to place such a damning label on schools and then refer to counties as " nonapproved ". Do not use the terminology "seriously impaired" at all. Refer to schools that have not met standards as " nonapproved ".	NA/-	Specified in W.Va. Code §18-2E-5.
12/6/00	Carol M. Hall, Editor	Beneficial to schools - lets them see where correction needed.	N/+	No action indicated.
§126-13-11. School System Approval				
12/6/00	Carol M. Hall, Editor, Mountain Messenger Newspaper PO Box 429 Lewisburg, WV 24901	Good.	N/+	No action indicated.

Date	Individual/Organization	Comments	Action/ Type	Rationale
§126-13-12. Nonapproval Status				
12/6/00	Carol M. Hall, Editor, Mountain Messenger Newspaper PO Box 429 Lewisburg, WV 24901	Good follow-up - Will ultimately be of benefit to students to get their school up to par. The idea of intervention is especially good.	NA/+	No action indicated.
1/9/01	Joe McClung, Principal Meadow Bridge High School	Who determines #2? Is there any possibility of a workable system of notification and due process being included in the accreditation process. It has been my experience that what is used now is not fair to schools in any way. We are required to abide by timelines and dates certain. Somewhere, somehow, somehow there needs to be built into the O.E.P.A. process a method of making sure that that office is required to follow procedures similar to the ones that school administrators are required to follow when dealing with students and teachers. Fair is fair!	N/-	Comment unrelated to proposed revisions.
§126-13-13. On-Site Reviews				
12/8/00	Bob Harris, Wood County Schools 1210 Thirteenth St. Parkersburg, WV 26101-4198	13.3 - This reads like the two sentences conflict. A trained cadre versus audit teams. Huh?	NA/-	Specified in Tomblin v. Gainer Agreed Order.

Date	Individual/Organization	Comments	Action/Type	Rationale
1/9/01	Monongah Middle School & Teachers	<p>13.3 - Education performance audit teams should be made up, as they currently are, of active, working out-of-county personnel who are employed temporarily on an as-needed basis. These teams give greater insight into a county's problems because they daily try to do these same jobs themselves. They are not hired bureaucrats, who make it their duty to locate problems in order to keep their full-time job. Such teams would not come with the knowledge and empathy needed to evaluate fairly.</p>	N/-	Specified in Tomblin v. Gainer Agreed Order.
1/16/01	Scott J. Capito, Teacher Monongah Middle School	<p>13.3 - Education performance audit teams should be made up, as they currently are, of active, working out-of-county personnel who are employed temporarily on an as-needed basis. These teams give greater insight into a county's problems because they daily try to do these same jobs themselves. They are not hired bureaucrats, who make it their duty to locate problems in order to keep their full-time job. Such teams would not come with the knowledge and empathy needed to evaluate fairly. We also need to realize this will cost more money. With WV tax revenues so low does this really make good economic sense, when our teacher salaries have slipped to 41st from 30th only a few years ago!</p>	N/-	Specified in Tomblin v. Gainer Agreed Order.

Date	Individual/Organization	Comments	Action/ Type	Rationale
12/6/00	Carol M. Hall, Editor, Mountain Messenger Newspaper PO Box 429 Lewisburg, WV 24901	Purpose of On Site Review very well "spelled out." The team effort is good AS LONG AS - the County Board Superintendent and/or Principal can get the help/expertise they need to correct deficiency(s) if special help is needed - Should be forth coming.	N/+	No action indicated.
1/11/01	Ken Beale, Principal Pikeside Learning Center	Eliminate or change - they have some merit but on the whole from my experience and from numerous others I have talked to, they are a waste of time and money.	NA/-	Required by W.Va. Code §18-2E-5.
§126-13-14. Capacity Building				
12/6/00	Carol M. Hall, Editor, Mountain Messenger Newspaper PO Box 429 Lewisburg, WV 24901	I think this is a good plan - it does provide assistance to School Boards et al. All in all Policy 2320 very good.	N/+	No action indicated.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Carol M. Hall
Position: Editor
Name of County, School, Business, etc: Mountain Messenger Newspaper
Street Address: P.O. Box 729
City/State/Zip: Lewistown WV 24901

COMMENTS/SUGGESTIONS

§126-13-1. - General.

Well thought out, clear language.

§126-13-2. - Purpose.

*Accreditation process more thorough.
High standards coming back to where they need
to be.*

§126-13-3. - Responsibility.

assessment system & cellent - covers all aspects
of education, I especially liked " 3.2.3 - "Target-
ing additional resources - - - - -"
also 3.9.4, 5 + 6 are excellent

§126-13-4. - Annual Performance Measures.

These are admirable goals, especially
4.6.5 - good addition - re: Classroom size -
LONG QUEUE

§126-13-5. - High Quality Standards.

Like the inclusiveness of 126-13-5. I thought
5.1.4 and 5.1.7 & 8 were especially good, but
5.1.9 - excellent. This will be especially helpful to
students (tho some might not like it!) it will
certainly be of great value all through life.
5.1.13 is also an excellent idea & will help to ensure
that NO STUDENT "falls through the cracks"
ALL of these from 5.1.13 to 5.12.5 are just excellent

§126-13-6. - Indicators of Efficiency.

6.1 to 6.1.6 - Great additions. Really spells things out.

§126-13-7. - County and School Improvement Plan Process.

76.1 Unified County Plan - I didn't see where it "spelled out" who creates the PLAN? at my rate the plan will be invaluable by putting in writing the "identified needs + school performance" data - a good guide for future activities. and as a way to measure various activities or lack of some. I believe the "periodic, random + unannounced on-site reviews" is an excellent idea.

§126-13-8. - School Accreditation Status.

Good.

§126-13-9. - Exemplary Accreditation Status.

Good "measuring stick"

§126-13-10. - Seriously Impaired Status.

Beneficial to schools - let them see where corrections needed

§126-13-11. - School System Approval.

Good.

§126-13-12. - Nonapproval Status.

Good follow-up -
will ultimately be of benefit to students
to get them school up to par.
The idea of intervention is especially good

§126-13-13. - On-Site Reviews.

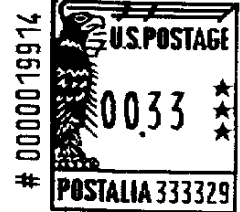
Purpose of On Site Review ^{is} well
"spelled out." The team effort is good AS LONG
AS - the County Board Superintendent and/or
Principal can get the help/expertise they need to
correct deficiencies if special help is
needed - it should be forth coming.

§126-13-14. - Capacity Building.

I think this is a good plan - it does provide
assistance to School Boards et al

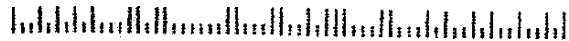
all in all Policy 2320 my good

Policy 2320
Comments/Suggestion Form
Page 6



Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagan Street, Suite 204
Charleston, WV 25301

25301-1200 01



**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Mineral Co. Schools/Eleanor Grubbs-Paull

Position: Assistant Director - General Education

Name of County, School, Business, etc: Mineral

Street Address: One Baker Place

City/State/Zip: Keyser, WV 26726

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

Dates of June 15 and Sept. 1 (School and County dates respectively) may be "too early" to allow time for test data to be received and analyzed for goal setting (as mandated by the USI Plan process). To be meaningful to the improvement process, all data will need to be available to schools on or before June 1st. This is not the case in most counties.

§126-13-8. - School Accreditation Status.

§126-13-12. - Nonapproval Status.

§126-13-13. - On-Site Reviews.

§126-13-14. - Capacity Building.

**Belington Elementary School
Route 2, Box 344
Belington, WV 26250
December 14, 2000
Phone: 304-823-1411**

DEC 18 2000

Dear Dr. Davis,

I am writing to comment on proposed Policy 2320.

I have been an elementary principal for 19 years. I have been at Belington Elementary School for the past ten years. I have concerns about Proposed Policy and Title 2320, A Process for Improving Education-Performance Based Accreditation System.

In 7.2 of this policy, it is written that each school develops a Unified School Improvement Plan or an equivalent plan by June 15. I am on a 205-day contract. This means I work three days before the teachers come in to work in the fall, and I have two days to work after teachers leave in the spring. This year, I visited a school in Texas as part of the Reading Excellence Grant our county was fortunate to receive. As much as I enjoyed this trip, two of my contract days were used on a Saturday and Sunday that was part on this trip. When school is out for teachers this spring, my contract as principal has been fulfilled. When would I have time to complete this Unified Plan? Is your answer on my own time? On years that I do have two days after teachers, time is spent on ordering, completing paperwork for the school year, and many other end of the school year tasks.

My other concern is with 5.6.14. The part of this that I feel is unfair is "Education Performance Audit teams will verify that all student are eligible for testing under non-standard conditions if the non-standard percentage of students exceeds 10 percent." Belington Elementary School is a Mildly Mentally Disabled feeder school for two smaller elementary schools. We receive all of these children, who are not part of our attendance area and only attend our school because we have the program that the other two schools don't have. Currently we have 20 students in our M.M.D. class, four of these students are from a smaller school out of our attendance area. Why should these students be counted as our attendance areas 10%? I think a special exemption should be made for feeder schools or those students should be counted in with the school they would attend if the M.M.D. program were available in their attendance area.

Thank you for consideration on my concerns.

Sincerely,

Alice Tenney

Alice Tenney (Dr.)

ASHFORD-RUMBLE ELEMENTARY SCHOOL
"A WEST VIRGINIA TITLE I DISTINGUISHED SCHOOL" DEC 20
"SCHOOLWIDE TIGER PRIDE"
HC 64 BOX 540
ASHFORD, WV 25009
836-5381

DR. DONNA DAVIS, DEPUTY DIRECTOR DEC., 2000
OFFICE OF EDUCATION/PERFORMANCE AUDITS
550 EAGAN STREET, SUITE 204
CHARLESTON, WV 25301

* RE: POLICY 2320 - RESPONSES TO ACCREDITATION DRAFT

✓ THE CURRENT "PERFORMANCE BASED" ACCREDITATION PROCESS IS FLAWED IN MANY, MANY WAYS. BASING A SCHOOL'S EFFECTIVENESS CAN NEVER BE MEASURED APPROPRIATELY BY USING SUBJECTIVE STANDARDS AND STATISTICALLY INAPPROPRIATE TEST DATA.

✓ AS SEEMS PAR FOR THE COURSE, TO CORRECT THE SITUATION WE RAISE STANDARDS, ADD NEW STANDARDS AND INCREASE THE PROBABILITY THAT MORE SCHOOLS AND COUNTY SCHOOL SYSTEMS WILL NOT MEET THE STATE'S REQUIREMENTS FOR SCHOOL ACCREDITATION. IS THIS WHAT WE WANT?

✓ IT SEEMS SOMEONE IS AGAIN TRYING TO RAISE THE BAR OF SUCCESS AS INDICATED BY SOME OF THE NEW STANDARDS IN THE DRAFT COPY OF THE NEW ACCREDITATION DOCUMENT. INSTEAD OF RAISING STANDARDS OR ADDING NEW STANDARDS, WE NEED TO SERIOUSLY LOOK AT ELIMINATING AND REVISING SOME OF THE CURRENT STANDARDS IN THE ACCREDITATION DOCUMENT.

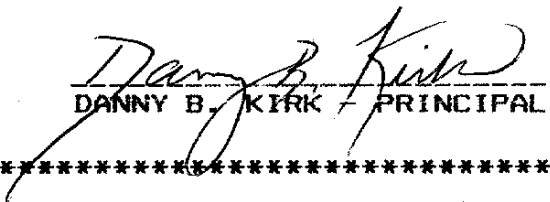
* THE CURRENT AND PROPOSED PERFORMANCE BASED ACCREDITATION STANDARDS REFLECT ACHIEVEMENT LEVELS THAT ARE TOO HIGH!
✓ THESE INFLATED ACHIEVEMENT LEVELS SET INDIVIDUAL SCHOOLS AND COUNTY SCHOOL SYSTEMS UP FOR FAILURE. I FEEL IT WOULD BE BETTER TO SET THE STANDARDS AT A LOWER LEVEL FOR ACCREDITATION PURPOSES BUT STILL STRIVE FOR HIGHER EXPECTATIONS FROM STUDENTS, SCHOOLS AND COUNTY SCHOOL SYSTEMS.

✓ YOUR TITLE SAYS POLICY 2320 IS A "PROCESS FOR IMPROVING THE EDUCATION-PERFORMANCE BASED ACCREDITATION SYSTEM." IF YOU ARE SERIOUS ABOUT IMPROVING THE ACCREDITATION SYSTEM, WE NEED TO LOOK VERY CAREFULLY AT WHAT THE SYSTEM ACTUALLY DOES TO INDIVIDUAL SCHOOLS AND COUNTY SCHOOL SYSTEMS BASED ON THE CURRENT AND PROPOSED STANDARDS.

* WE NEED HELP!!!

* WE ARE IN A LOSE, LOSE SITUATION!

* WE'RE SHOOTING OURSELVES IN THE FOOT!


DANNY B. KIRK / PRINCIPAL

ASHFORD-RUMBLE'S LAST ACCREDITATION REPORT WAS EXCELLENT!
WE ONLY HAD 1 CITATION FOR NON-EDUCATION COACHES WHICH WAS CORRECTED AT THE COUNTY LEVEL AND WE HAD SIX COMMENDATIONS FROM THE ACCREDITATION TEAM.

SCHOOLWIDE TIGER PRIDE

*

* See Attached!

ASHFORD J-RUMBLE ELEMENTARY SCHOOL
"A WEST VIRGINIA TITLE I DISTINGUISHED SCHOOL"
"SCHOOLWIDE TIGER PRIDE"
HC 64 BOX 540
ASHFORD, WV 25009
836-5381

DR. DONNA DAVIS, DEPUTY DIRECTOR
OFFICE OF EDUCATION/PERFORMANCE AUDITS
550 EAGAN STREET, SUITE 204
CHARLESTON, WV 25301

DEC., 2000

* RE: POLICY 2320 - RESPONSES TO ACCREDITATION DRAFT

I FEEL THE FOLLOWING STANDARDS NEED TO BE REVISED OR ELIMINATED: (CURRENT STANDARDS ARE TOO STRINGENT!)

✓ ELIMINATE "PERFORMANCE BASED" FROM ACCREDITATION SYSTEM TITLE
NOW THAT MAROCKIE IS GONE WE NEED TO MOVE AWAY FROM OUR
CURRENT PERFORMANCE BASED ACCREDIATION SYSTEM!

* EVERYONE WANTS STUDENTS TO ACHIEVE AND BE SUCCESSFUL! WE ALL
BELIEVE THAT "HIGH EXPECTATIONS" ARE IMPORTANT. HOWEVER, WE
CURRENTLY HAVE STANDARDS THAT REFLECT ACHIEVEMENT LEVELS THAT
ARE TOO HIGH! THESE INFLATED ACHIEVEMENT LEVELS SET
INDIVIDUAL SCHOOLS AND COUNTY SCHOOL SYSTEMS UP FOR FAILURE.
✓ I FEEL IT WOULD BE BETTER TO SET THE STANDARDS AT A LOWER
LEVEL FOR ACCREDITATION PURPOSES BUT STILL STRIVE FOR HIGHER
EXPECTATIONS FOR STUDENTS, SCHOOLS AND COUNTY SCHOOL SYSTEMS.

2.4.1 - ELIMINATE THIS STANDARD - SUBJECTIVE - IMPROBABLE

2.4.3 - ELIMINATE THIS STANDARD - STATISTICALLY IMPROBABLE

2.4.4 - ELIMINATE OR REVISE STANDARD TO 75% (% GRADUATES)

3.9.6 - ELIMINATE THIS STANDARD -

3.9.6 - ANYTIME YOU SHOW DIFFERENCE AS IN ONE SCHOOL IS
EXEMPLARY AND ANOTHER IS ON PROBATION, ETC. YOU CAUSE
PROBLEMS! ELIMINATE THIS STANDARD

126-13-4 - ANNUAL PERFORMANCE MEASURES:

VALUE ADDED ACHIEVEMENT STANDARDS SHOULD BE
ELIMINATED ENTIRELY!

* 4.1 - ELIMINATE OR REVISE THIS STANDARD! STATISTICALLY
IMPROBABLE THAT 50% OR MORE OF YOUR STUDENTS WILL BE
ABOVE AVERAGE! THIS STANDARD SHOULD NOT
BE INCLUDED IN THE ACCREDIATION DOCUMENT!

✓ 4.1 - REDUCE THE 15% IN THE 1ST QUARTILE TO 5%

✓ 4.2 - REDUCE THE ATTENDANCE RATE TO 85%

✓ 4.3 - ELIMINATE THE DROPOUT RATE STANDARD!

* 4.4 = ELIMINATE THIS STANDARD! THE WRITING ASSESSMENT
STANDARD SHOULD NOT BE INCLUDED IN THE ACCREDIATION
DOCUMENT! SUBJECTIVE! IMPROBABLE! UNNECESSARY!

4.5 - REVISE GRADUATION RATE TO 85% SETTING THE STANDARD
AT 95% INCREASES THE ODDS THAT SCHOOLS WILL NOT MEET
THIS STANDARD!

4.10 - ELIMINATE THIS STANDARD (RESPONDING GRADUATES)

4.11 - PARENT INVOLVEMENT - REDUCE STANDARD TO 50% OR ELIMINATE STANDARD ENTIRELY

✓ 4.12 - SURVEYS! ELIMINATE ENTIRELY! OUR SURVEY RESULTS HAVE BEEN EXCELLENT OVER THE PAST 10 YEARS! APPROX. 90% SATISFACTION RATE! HOWEVER, A STANDARD SUCH AS THIS SHOULD NOT BE INCLUDED FOR ACCREDITATION!

✓ 4.13 - ELIMINATE THIS STANDARD! (33% GRADUATES - 70TH %TILE)

✓ 4.15 - ELIMINATE THIS STANDARD! (HONORS CLASSES AT 5%)

5.1.19 - WORK-BASED LEARNING REQUIREMENTS SHOULD BE ELIMINATED!

✓ 5.6.16 - SKILL IMPROVEMENT PROGRAM REQUIREMENT SHOULD BE ELIMINATED!

5.9.4 - PRINCIPAL'S ACADEMY REQUIREMENT SHOULD BE ELIMINATED! IT'S UNFAIR TO PUNISH PRINCIPALS BECAUSE OF STANDARDS THAT ARE TOO HIGH!

✓ 5.10.6 - LESSON PLANS - ONCE EACH SEMESTER IS ENOUGH! IN A SMALL SCHOOL IT WOULD BE EASY, BUT IN A LARGE SCHOOL IT WOULD BE DIFFICULT! LEAVE IT AS IS! 1 TIME PER SEMESTER

* 126.13-8 SCHOOL ACCREDITATION STATUS - PROBLEMS IN THIS AREA! LEAVE OUT EXEMPLARY ACCREDITATION STATUS! THE STATES SO CALLED "MINIMAL" STANDARDS ARE DIFFICULT ENOUGH TO MEET! A SCHOOL'S ACCREDITATION STATUS SHOULD NOT BE MADE PUBLIC! THE ACCREDITATION PROCESS SHOULD BE USED TO HELP A SCHOOL OR COUNTY SYSTEM IMPROVE. THE MEDIA USES THE PROCESS TO COMPARE SCHOOLS AND SCHOOL SYSTEMS. MOST OF THESE COMPARISONS ARE BASED ON TEST DATA WHICH IS UNFAIR. THE ENTIRE SYSTEM NEEDS TO BE REVISED OR ELIMINATED! WE ARE SETTING OURSELVES UP FOR FAILURE!

* NOTE: I HAVE BEEN A SCHOOL PRINCIPAL FOR OVER A QUARTER OF A CENTURY. ALTHOUGH I'VE SEEN POSITIVE CHANGES OVER THE COURSE OF MY CAREER, THE "MAROCKIE YEARS" HAVE BEEN DEVASTATING TO THE STATE'S SCHOOL SYSTEM. IT'S TIME TO TAKE A LONG HARD LOOK AT THE WV PUBLIC SCHOOL SYSTEM AND HOPEFULLY MAKE SOME DRAMATIC, SWEEPING CHANGES. STUDENT ACHIEVEMENT IS IMPORTANT, BUT STUDENTS ARE MORE IMPORTANT!

Danny B. Kirk
DANNY B. KIRK - PRINCIPAL

SCHOOLWIDE TIGER PRIDE

*



WINCHESTER AVENUE SCHOOL

650 Winchester Avenue
Martinsburg, WV 25401

TELE: 304-267-3570 - FAX: 304-267-3572

FAX TRANSMITTAL

TO: Dr. Donna Davis, OEPAFROM: J. Chapman, PrincipalDATE: 01/02/01PAGES TRANSMITTED INCLUDING THIS PAGE 5

COMMENTS:

Dr. Davis -

Some of these standards
are really unattainable in some
areas of the state - even for the
best of schools. Please share these
concerns. If you would like to
discuss these comments, I can be
reached at 267-3570 or 3571.

Thanks,
J Chapman

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Joyce L. Chapman

Position: Principal

Name of County, School, Business, etc: Berkeley Co - Winchester Avenue Sch

Street Address: 650 Winchester Avenue

City/State/Zip: Martinsburg, WV 25401

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

Policy 2320

Comments/Suggestion Form

Page 2

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

- ✓ 4.2 - much more reasonable rate for attendance at 92.5%
- ✓ 4.3 - drop out rate should remain at 6% - very difficult to maintain in high growth & transient population counties
- ✓ 4.4 - very difficult standard - many schools especially elementary schools need to focus on READING after success occurs here, then writing will follow - 60% at 2.0 level may be reasonable
- ✓ 4.13 - basic skills score is better

§126-13-5. - High Quality Standards.

- ✓ 5.1.9 - clearer and can be accomplished
- ✓ 5.2.2 - good addition of school plans
- ✓ 5.10.6 - based on IGO's - not w/ each IGO noted in plans - could have a long term plan in plans - grade level IGO's

Policy 2320

Comments/Suggestion Form

Page 3

§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

¶1.2 - June 15th is unreasonable, much test data is not available, student populations change drastically before the next year begins, and little or no staff development is available at year's end. Should be left at Sept. 30th

§126-13-8. - School Accreditation Status.

Policy 2320

Comments/Suggestion Form

Page 4

§126-13-9. - Exemplary Accreditation Status.

- ✓ 9.4 - ^{Totally} Unreasonable - as a WU Blue Ribbon School - we have never reached this level of writing achievement. 10-12% would be more realistic and difficult to obtain.
- ✓ 9.2 - Make this attendance rate an average of 96 in the "2" most recent years - a chicken-pox epidemic can drop an elementary school an entire percentile point.
- ✓ 9.1 - reasonable and obtainable
- ✓ 9.3 - Virtually impossible in growth areas.

§126-13-10. - Seriously Impaired Status.

§126-13-11. - School System Approval.

Musselman Middle School

W. L. Aikens
Principal

8784 Winchester Avenue
Bunker Hill, WV 25413
(304) 229-1965

RESPONSE TO POLICY 2320

126-13-4

✓ 4.4 50% of the 7th grade students scoring 2.5 or above is a lofty goal considering the present state average is a little over 2 for the last 3 years. I feel that 35% at or above 2.5 would be a more reasonable goal at this time.

126-13-76

✓ 7.2 Changing the date of the USIP from 9/30 to 6/15 is absurd. We barely get our test results by the end of May and sometimes not until early June. Therefore, when are we to have adequate time as a staff to evaluate our results and create a viable plan for the next school year? Teachers and secretaries work until approximately June 8, so do you think we actually would have time to develop a stellar plan in that short amount of time. Is the state willing to compensate teachers and staff to stay longer to complete the USIP? Does anyone in Charleston realize how many other things are required to end a school year and now you want to add another major component. This is really a bad move!!!

Lynn Aikens, Principal



Musselman Middle School

W. L. Aikens
Principal

8784 Winchester Avenue
Bunker Hill, WV 25413
(304) 229-1965

FAX TRANSMITTAL
(304) 229-1967

TO: DONNA DAVIS

FROM: MR. AIKENS

DATE: 1/3/01

NUMBER OF PAGES(including cover sheet) 2

COMMENTS Call if you have comments

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual Organization: Danny W. Pettry
 Position: Principal
 Name of County, School, Business, etc: Raleigh Co. Crescent Elementary
 Street Address: 205 Crescent Rd.
 City/State/Zip: Beckley, WV 25801

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

Crescent Elementary School

OFFICE OF THE PRINCIPAL
206 CRESCENT ROAD
BECKLEY, WEST VIRGINIA 25801

1-3-01

Dr. Donna Davis:

I am very concerned about the new performance indicator 4.4 (a performance indicator on writing assessment) in the proposed policy 2320.

This indicator states, "A minimum of fifty percent (50%) of the school's students score at or above 2.5 on the Writing Assessment or show an increase in two (2) of the most recent three (3) years; and no more than fifteen percent (15%) of the school's students score below 2, or the percentage of students scoring below 2 is decreased based on two (2) of the most recent three (3) years."

This 2.5 would be at the 50% range if the Writing Assessment had a possible high score of 5, but it doesn't. The possible high is 4. If this 2.5 out of a possible 4 was converted to percentiles, such as the SAT 9, it would be close to the 62nd. It seems unfeasible for 50% of our students to score above the 50th percentile on the SAT 9 (an average for grades three through six in the elementary schools) and that 50% of our fourth graders now have to score above the 62nd percentile on their Writing Assessment. Also, this new indicator would require that no more than 15% of our students score below (2.0) which is really average on a test with a possible high of 4.0. This is an unrealistic requirement, especially for a test which, unlike the SAT 9, is **subjectively scored**.

We will not be giving the Writing Assessment for this school year (2000 -2001) until March so we don't know what those scores will be, but we do know that the average score for the State of WV in the fourth grade for the 1999 - 2000 school year was 2.13. If this was the average score, I would assume that 50% of the students in WV were below 2.13. What percentage of our students will be below 2.5 on this new indicator? How many excellent schools will become seriously impaired due to this indicator?

Our school is working very hard on writing. Teachers are using computers, "Dream Writers", and writing across the curriculum at all grade levels to increase these scores. Nobody is more concerned about test scores than the teachers and principals who are held responsible and accountable.

To: Dr. Donna Davis

From: Danny Peetry

Pages including cover

3

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/ Organization: Crescent Faculty Senate

Position: _____

Name of County, School, Business, etc: Raleigh Co. - Crescent School Faculty Senate

Street Address: 205 Crescent Rd.

City/State/Zip: Beckley, WV 25801

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

Policy 2320
Comments/Suggestion Form
Page 2

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

2.5 is an unrealistic expectation for the fourth grade writing assessment when it is subjectively scored and the present State average is 2.13.

§126-13-5. - High Quality Standards.

To: Dr. Donna Davis

From: Crescent School Faculty
Senate

of Pages including cover

3

Libby Smith

From: Donna Davis [dndavis@access.k12.wv.us]
Sent: Friday, January 04, 1980 12:24 AM
To: Libby Smith
Subject: FW: Comments for performance based accreditation system

Libby, comments to add to the log. donna

-----Original Message-----

From: Debbie Russell [mailto:darussel@access.k12.wv.us]
Sent: Tuesday, January 02, 2001 2:51 PM
To: dndavis@access.k12.wv.us
Subject: Comments for performance based accreditation system

- ✓ Annual performance measures: I am concerned about what the value-added approach means. Currently we have data for the SAT/9 and know where we stand. What would the value added approach mean to us? Who determines the data involved? How will this help with increasing the student scores?
- ✓ 4.2 Will specific requirements be developed for adjusting the attendance for safe school infractions and school bus interruptions. How will this be handled for attendance purposes?
- ✓ 5.9 What will a beginning principal internship program entail? Is this different than mentoring? Will the principal be currently employed or work under an existing principal prior to being hired as a principal and given a school? Will specialized training be given to the administrator supervising the intern principal? How will supervising principals be chosen?
- ✓ 5.10.6 Why is the requirement changed for the principal to comment on lesson plans from once each semester to once each quarter. With many elementary principals having no assistant and no guidance counselor it is difficult for this to be accomplished. I supervise 36 teachers with no assistance. This is one more paperwork requirement that is added to the burden.
- 5.11.6 Although the PPFT is an admirable goal to shoot for, it is highly difficult to change the couch potato behavior of our students with only 45 minutes per week for PE. With current resources available this is the only time we can allot for PE. Are we in the business of training athletes or teaching students?
- ✓ It has taken much time and effort to prepare files for accreditation. Now the numbers have changed. It will take more precious time to change and prepare for the new standards which are essentially the same. Enough with the paperwork. We need to be in classrooms and working with teachers not shuffling files.

*EAST FAIRMONT JUNIOR HIGH
SCHOOL*

JAN - 4 2000

December 18, 2000

Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagan Street, Suite 204
Charleston, WV 25301

Dear Dr. Davis,

After a careful review and critique of the recently publicized Executive Summary of the West Virginia Board of Education policy, the faculty senate of East Fairmont Junior High School in Marion County would like to comment on the proposed revisions concerning writing assessment scores.

Due to the fact that the West Virginia state average writing assessment score is below a 2.0, we find that proposal clause 4.4 in legislative rule 126CSR13 is unreasonable and unattainable. This proposal, which expects 50% of our student population to score above a 2.5 and no more than 15% below a 2.0 on the writing assessment test, is extremely unrealistic. We therefore urge you to reconsider the values involved in this clause and make them somewhat more compatible with the current state average.

We all agree that progress and improvement is necessary but realize that it cannot happen overnight with the institution of a new policy plan. We hereby suggest either more realistic and attainable expectations or an acceptable long-term improvement plan to address, more effectively, low writing assessment scores concerns.

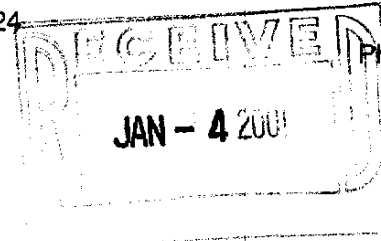
We thank you for your attention and dedication to the educational field.

Sincerely,

Marlinton Middle School

Route 2, Box 52-S
Buckeye, WV 24924

Phone (304) 799-6773



January 2, 2001

Dr. Donna Davis, Deputy Director
OEPA
550 Eagan Street, Suite 204
Charleston, WV 25301

Dear Dr. Davis,

I am writing to comment on Policy 2320. Most of the changes seem to be relevant and necessary, however there is one I question. The addition of the Writing Assessment to the standards is a welcome addition, but seems too hasty. I feel it is unrealistic to make the benchmark at 50% of students at 2.5 or better in the first year. I think that this should be phased in over a period of years to allow for the training that teachers obviously need to make students more successful. What about beginning at 50% at 2.0 and then gradually going to 2.5 after two or three years? It is a needed standard, but at the present time I think it is unrealistic.

Thank you for considering my opinions on this matter.

Sincerely,

A handwritten signature in cursive script that reads "Sue Hollandsworth".

Sue Hollandsworth

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Lorraine Fletcher - Shady Spring Elem.

Position: Teacher - 5th grade

Name of County, School, Business, etc: Raleigh

Street Address: P.O. Box 2009

City/State/Zip: Shady Spring, WV 25832

COMMENTS/SUGGESTIONS

✓ **§126-13-1 - General.** I am responding to the 2.5 on the 4th Grade Writing Assessment to achieve accreditation. This is setting an unrealistic requirement for students and schools to obtain. Being a 5th grade regular education teacher, each fall I carefully examine the results of students placed in my room. I have noticed that it is extremely difficult for students to score above a 2.0 - even students possessing an excellent command of the writing process. Since 2.0 is the mean, how can we expect an entire school system to be required to score higher than the mean. Since a 2.0 is very difficult to obtain, I feel this recommendation needs careful thought and revision.

§126-13-2 - Purpose.



Miller Junior High School

2 Pennsylvania Avenue • Fairmont, West Virginia 26554
Telephone (304) 367-2147

JAN - 5

January 3, 2001

Dr. Donna Davis
Deputy Director, OEPA
550 Eagen Street, Suite 204
Charleston, West Virginia 25301

Dear Dr. Davis:

I have reviewed the revised SBP2320/A Process for Improving Education
and am submitting these comments for consideration:

- ❖ "Value-Added Approach" mentioned in 126-13-4 is not defined, therefore, I am not certain how this will impact Miller Junior High School.
- ❖ Indicator 4.4 which adds the "Writing Assessment" to the performance standards. It appears as though a score of 2, on a scale of N - 4 should be the point at which fifty percent of the students must score.

Thank you for your kind consideration in this matter.

Sincerely,

Stephen C. Higgins
Principal

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

JAN - 5 2011

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Pat Conaway

Position: principal

Name of County, School, Business, etc: Boone County Kindergarten Academy

Street Address: P.O. Box 730

City/State/Zip: Oneda, WV 25205

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

✓ The value-added approach seems to be unrealistic. Perhaps I don't understand what the expectation is.

§126-13-5. - High Quality Standards.

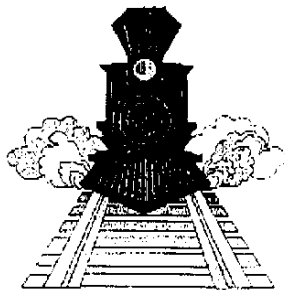
§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

7.1 The September 30th date
is more appropriate for each
school term than June 15th.

§126-13-8. - School Accreditation Status.

SHORT LINE SCHOOL



HC 60 BOX 170 ♦ READER WV 26167
 Phone 304/386-4115 ♦ Fax 304/386-4969
 JANE BECKETT, PRINCIPAL
 RUSSELL MCKEEN, ASSISTANT PRINCIPAL

FAX COVER SHEET

TO: Pc. Donna Davis

LOCATION: OEPA

FAX NUMBER: (304) 558-2405

FROM: Russ McKeen

DATE: 1-5-01

TIME: 9:30 AM.

NUMBER OF PAGES INCLUDING COVER SHEET: 3

MESSAGE: _____

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Russ McKeen

Position: Asst. Principal

Name of County, School, Business, etc: Short Line School, Wetzel County

Street Address: HC 60 Box 170

City/State/Zip: Reeder, WV 26167

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

Policy 2320
Comments/Suggestion Form
Page 2

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

Why change the numbers again. If certain standards are deleted, just delete that number. Otherwise, the state department needs to send us new folders with numbers and labels on them. This is very time consuming the way it is now.

§126-13-5. - High Quality Standards.



BOARD OF EDUCATION
County of Wood
Department of Special Education
 1210 THIRTEENTH STREET
 PARKERSBURG, WEST VIRGINIA 26101
 Telephone 304/420-9655
 FAX # (304) 420-9689

FAX TO: (Name and Fax #)	Donna Davis (304) 558-2405
FAX FROM:	Juan Santen
REGARDING:	Policy 2320 Comments
DATE:	1-8-01
TIME:	11:50
NUMBER OF PAGES (including the cover sheet):	3



January 8, 2000

Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagan Street, Suite 204
Charleston, WV 25301

Dear Dr. Davis:

Enclosed are my comments regarding West Virginia State Board Policy 2320, Performance Based Accreditation System.

Please contact me if you have any questions or concerns regarding these comments.

Sincerely,

A handwritten signature in cursive script that reads 'Yvonne Santin'.

Yvonne Santin,
Director of Special Education
Wood County Schools

**Comments regarding WVBOE Policy 2320
Performance Based Accreditation System
(January 8, 2000)**

- ✓ 4.13 This appears to be lowering the benchmark instead of raising it . . . Using this standard would enable a school's deficits in one area to go unaddressed if other areas are high enough to compensate for the deficit. Schools need to have an improvement plan to address specific weaknesses.
- ✓ 4.14 Again, this appears to be lowering the benchmark and eliminating analysis in detail for each area of basic skills.
- ✓ 4.15 This standard should reflect different percentages at different grade levels. Also consideration should be given to having schools write some type of plan to improve the fitness rate.
- ✓ 5.10.6 Reviewing lesson plans once each quarter is too much of nothing. Wouldn't it be better if principals were required to observe lesson plans of teachers who had inadequate lesson plans? This is going to require excessive amounts of time for principals to review lesson plans this frequently.
- ✓ 5.12 How are these to be measures, defined, or verified? Are not these covered in WVBOE 5500?
- ✓ 126-13-6 Again, how are these "indicators of efficiency" to be specifically defined, measured, and verified?
- 126-13-10 How many schools can meet this standard? Is this attainable? Don't we already have a process for Exemplary School status?

Submitted by Yvonne Santin,
Special Education Director
Wood County Schools
(304) 420-9655

Donna Davis

From: Dianna Buchman [dbuchman@access.k12.wv.us]
Sent: Monday, January 08, 2001 10:02 PM
To: dndavis@access.k12.wv.us
Subject: Policy 2320 Comments

*Libby,
I don't
know if you
have this one*

Dr. Davis;

I have reviewed the version of Policy 2320 that is currently on comment period. I have the following concerns.

I and many principals have spent hours working on our documentation for the Performance Audit. We have files developed. Many of the changes seem to be for the purpose of changing numbers since they only have slight changes in wording or no changes except moving them around such as 4.14 to 5.11.6 and 5.6.2 to 5.6.10.

I also feel that during an On-Site Performance Audit there needs to be consistency among team members. All schools should begin on a level playing field and be judged against the same standards looking for the same documentation. This does not always happen.

§126-13-4 "...new students achievement standards will be applied that are based upon a value added approach..." What does this mean? I am not familiar with the term value added. How will these be measured? We have spent the years developing the base line data for SAT9 and preparing students to take this test. Our IGO's are based on this test and teachers are currently using these IGO's and SAT9 test results to plan instruction.

4.2 "...adjusted for students as a result..." Will a method of adjustment be communicated to us from the State level so it will be consistent state-wide? The language about the school bus transportation seems to concern some principals. I did not get the same concern that some did, therefore, the language may need to be adjusted to avoid misinterpretation.

4.4 The WV Writing Assessment is a good diagnostic tool. Writing is an important part of the balanced reading program and schools should be held accountable. If this standard had been in effect this year, Ceredo Elementary would have met it. But I feel the consistency of the grading system from year to year would make it difficult to fairly assess meeting this standard. Grading by the adjudicators varies in strictness from year to year.

4.11 "...the level of parent involvement..." We need to be given a method of calculating this percentage. No one has ever been able to give me a logical, state-wide method of calculation.

5.1.9 "Instruction in writing..." The wording was changed from throughout all programs of study, which is explicit, to in every appropriate class. Who

this changes to quarterly you are increasing the paper work and lessening the time I can be in classrooms monitoring instruction. It would be much simpler to just sign off on reviewing them with comments when they are insufficient or poorly done and maybe making full comments only once or twice a year.

5.11.3 "A preventive discipline program.." Does this terminology mandate a Responsible Students Program and a student involvement program? We have a State validated RSP that works very well for us. Students are involved but we do not have a peer mediation program. The staff has not felt the need to develop one. This again will add to the time away from classrooms in my schedule when it is not needed.

6.1.1 "...school conduct an annual curriculum audit..." How is a curriculum audit different from what we currently do each year with our test analysis? If it is different, we need to have training provided. Again, more paper work!

7.2 The June 15 date for the Unified School Improvement Plan is unrealistic. We need test scores for our needs assessment so that we can review and change our plan. It would be great to have this finished and submitted by June 15 but we don't have our test scores in time to analyze them by this date let alone have the USIP revised and submitted.

Dianna L. Buchman, Principal
Ceredo Elementary

ge 2

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Charles D. Du Puy

Position: Executive Director

Name of County, School, Business, etc: RESTON

Street Address: 107 S College St

City/State/Zip: Martinsburg, WV 25401

COMMENTS/SUGGESTIONS

§126-13-1. - General.	Empty space for comments
-----------------------	--------------------------

§126-13-2. - Purpose.	Empty space for comments
-----------------------	--------------------------

Policy 2320
Comments/Suggestion Form
Page 3

§126-13-6. - Indicators of Efficiency.

I have concern that the new wording for Standard 6.1.6 is wordy, ambiguous and confusing. I would recommend that the standard be stated in its current form: "The county school system effectively participates with its assigned Regional Education Service Agency".

§126-13-7. - County and School Improvement Plan Process.

§126-13-8. - School Accreditation Status.

FAX COVER SHEET

Wood County Schools
1210 Thirteenth Street
Parkersburg, West Virginia 26101
Telephone: 304/420-9663

FAX NUMBER (304) 420-9513

**PLEASE DELIVER FAX
IMMEDIATELY**

**F
A
C
T
S**



About Wood County Schools

- School buses on 89 routes cover more than 1.5 million miles each year.
- Eight students chosen as National Merit Finalists for 1999-2000; Parkersburg High School is the current Class AAA Football Champions
- The WV Education Alliance recognized Wood County schools for outstanding school-business partnerships.

TO: Donna Davis

FAX NUMBER: 558-2405

FROM: Bob Harris


DATE: 12/8/2000

TIME: 4:00 pm

NUMBER OF PAGES:
(including this cover page) 3

MESSAGE:

Heaven help you with
this - some good reactions
but it sounds a bit tough.
Merry Christmas!



WOOD COUNTY
SCHOOLS
December 8, 2000

Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagan Street, Suite 204
Charleston, WV 25301

Dear Donna:

Please forgive this letter format instead of the comment form provided with the Executive Summary of Policy 2320. I reviewed the proposed policy and reacted as if we were talking together about its contents. Please understand no intentional criticism is given, just my gut reaction as I studied the policy. I have included language and typographical comments as well.

where ✓ Page 3 – Executive Summary: I believe a definition for value-added should have been included in the Impact section of the Executive Summary or somewhere in Policy 2320. Probably too late but I think there is a real misunderstanding of value-added. Is West Virginia using the Sanders approach as used in Tenn. or what? Some claim it will cure all ills. No matter what data is reviewed, we still have to make improvement. I would like to see all emphasis from your department is on evaluating to improve student achievement.

✓ Page 3: 3.2.3 Spacing needs fixed.

✓ Page 5: 4.4 –I have never seen any data from the state that indicates how counties are doing to currently meeting this standard which makes me question whether nor not the standard is written correctly? It appears to be a copied statement from the quartile range report statement in a later standard.

✓ Page 5 : 4.5 Can this be increased in WV now when other standards are not in place? Is this realistic?

✓ Page 6: 4.10 We need to throw this measure out as it is written. There is no guarantee of a minimum number of respondents, which invalidates the measure. Ten respondents with one on welfare equals 90% meeting the standard. What then? A school is temporarily accredited? I personally liked the original standard but add an improving trend factor for schools if you have to.

✓ Page 6: 4.13. This is really a dummying down of standards. Just because schools cannot reach the standard in reading, math and language subtests does not guarantee they will reach it with Total Basic Skills. Schools will once again fail to analyze data in individual subtests and instead work towards improvement in any number of wrong approaches. I would rather see the declining trend statement used here as well and return the standard back the way it was.

✓ Page 6: 4.14. Ditto

✓ Page 6: 4.15. How is this different than tracking? Will we have enrollments of 5 in these classes while regular classes will have enrollments of 95?

Page 9: 5.2.1 Define casual deficit in terms of percent here. This is redundant sounding.

Page 9: 5.24. Does the county distribute resources on the basis of the Unified School Improvement Plan as this reads? It needs cleaned up.

Page 10: 5.5.1 No system in WV can meet this standard. Will the CEEP be accepted? If so, why not state that?

Page 12: 5.6.10 This is not a sentence. Too many ands. Make it two or more sentences.

Page 12: 5.6.14 This is so confusing. I tried to determine where we were in Wood County from the State Department Assessment Office reports and I could not determine which column corresponded to the last sentence with 10%. Add or delete something here.

Page 13: 5.6.16 Why are you using reading, math, and language here for proficiency and warranty but you were using Total Basic Skills for 4.13 and 4.14? This inconsistency is of concern to me. It looks like padding the standards to achieve the result you want instead of setting the direction of where we all need to go.

Page 16: 5.10.6 Why not require more observation connected with lesson plans rather than just a review of lesson plans more often? A review each quarter does not guarantee a change in instruction in the classroom.

Page 16: 5.10.8 Rewrite: You can have an analysis of data system prior to the opening of the school year, but I think you mean they should implement it. This is very difficult to prove during on-sites. School have no control over when counties share data. Can the time frame be examined to include within 10 days of the start of the school year?

Page 17: 5.10.12 This should be stated the same way you state SAT9 data review. This statement is too global but I love that it is in here.

Page 18: 5.12.1 What is the standard and how will it be measured? Don't you think central office staff should be included here somewhere in the listing of effective leadership? Many times these people are a problem in school systems.

Page 19: 7.1 and 7.2 I have yet to be given a reason why these plans are due on these new dates. Our plans are developed 6 months in advance to facilitate the budget-building process. By changing the dates, our Board of Education has to set funds aside to be allocated after July 1st for the UCIP due on September 30th. We may not have the time to hear all school reports prior to determining the UCIP. We will manage, but there needs to be some real strong training on what the UCIP and USIP are to be in the future with these changes. Was this written to satisfy schools and counties that plan improvements only in the summer months?

Page 21: 9.1 Can any school in WV attain this status or just the higher socio-economic schools? How many can reach the standard now? Very, very few! Do we need it? Is there an incentive for this rating? More money? Pat on the back?

Page 26: 13.3 This reads like the two sentences conflict. A trained cadre versus audit teams. Huh?

I hope this helps you as you review and revise. If my comments are needed in a less reactionary way, please feel free to contact me for another copy. I know this was a difficult task. Good luck to you.

JAN - 9

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Delores Ranson

Position: Assistant Superintendent

Name of County, School, Business, etc: Jackson County Schools

Street Address: P. O. Box 770

City/State/Zip: Ripley, WV 25271

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13.3. - Responsibility.

§126-13-4. - Annual Performance Measures.

4.2: ... "adjust for students excluded as a result of the ...and school bus transportation interruptions." *This would be very difficult if not impossible to monitor.*

4.8: *This Annual Performance Measure should be moved into the area of High Quality Standards: Personnel 5.8.*

*Also, I can **not** find in school law that the assignment of the principal is based on the previous year's 2nd month enrollment report. I would believe that to meet West Virginia Code §18A-2-9, principal assignments would have to be for the current year.*

§126-13-5. - High Quality Standards

5.1.2: *I find this standard to be written awkwardly. Are instructional goals and objectives and the mission of the school provided to the teacher and the public upon request? All teachers should have copies of the instructional goals and objectives and of the school mission.....not only if they request them.*

5.1.9: *Will the "appropriate" classes be defined in the verification statement? If not, who will define?*

5.8.1 *This standard does not include providing personnel to meet the pupil/teacher ratio requirement of*

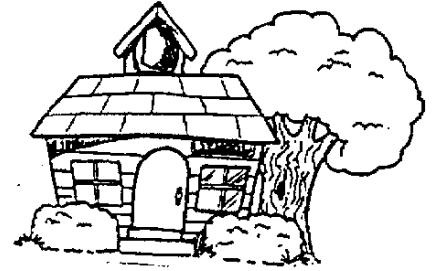
§126-13-6. Indicators of Efficiency.

§126-13-7. County and School Improvement Plan Process.

§126-13-8. - School Accreditation Status

126-13-9. *Exemplary Accreditation Status is almost impossible to meet.*

KENNA ELEMENTARY SCHOOL
P.O. BOX 127
KENNA, WV 25248
(304) 372-7343
FAX (304) 372-7313



CORA JONES, PRINCIPAL

TO: Donna Davis, Office of Ed Per. Audits

FAX #: 558-2405

FROM: Cora Jones

DATE: 1/9/01

NUMBER OF PAGES (INCLUDING COVER SHEET): 4

COMMENTS: _____

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

- ✓ 4.1 A clear definition of "value added" performance measures should be given
- ✓ 4.2 This attendance standard may be unrealistic for secondary level

§126-13-5. - High Quality Standards.

- ✓ 5.1.15 If we remediate (reteach) according to 5.1.13 and accelerate according to 5.1.15 are we tracking students?

§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

✓ 7,2 Making the USIP due on June 15 could require extended contracts in some counties where principals work only 210 days. It also comes due at a time when we are finishing/closing up for the school year.

§126-13-8. - School Accreditation Status.

AUTOMATIC COVER SHEET

DATE : JAN-09-01 04:13 PM

TO :

FAX # : 91800506951115161135
2170713045582405FROM : MEADOW1BRIDGE1HIGHSC
HOOL

FAX # : 3044847921

11 PAGES WERE SENT

(INCLUDING THIS COVER SHEET)

FAX

TO

DONNA DAVIS

O. E. P. A.

FROM

JOE MCCLUNG

MEADOW BRIDGE HIGH

1/9/01

POLICY 2320 COMMENTS

Phone 304-484-7917

Fax 304-484-7921

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Joe meckling

Position: Principal

Name of County, School, Business, etc: Fayette County, Meadow Bridge High School

Street Address: P.O. Box 10

City/State/Zip: Meadow Bridge, WV 25962

COMMENTS/SUGGESTIONS

§126-13-1. - General.

None

§126-13-2. - Purpose.

None

Policy 2320
Comments/Suggestion Form
Page 2

§126-13-3. - Responsibility.

None

§126-13-4. - Annual Performance Measures.

See Attached

§126-13-5. - High Quality Standards.

See Attached.

**Policy 2320
Comments/Suggestion Form
Page 3**

§126-13-6. - Indicators of Efficiency.

None

§126-13-7. - County and School Improvement Plan Process.

See attached.

§126-13-8. - School Accreditation Status.

None

Policy 2320
Comments/Suggestion Form
Page 4

§126-13-9. - Exemplary Accreditation Status.

None

§126-13-10. - Seriously Impaired Status.

See attached.

§126-13-11. - School System Approval.

See attached

**Policy 2320
Comments/Suggestion Form
Page 5**

§126-13-12. - Nonapproval Status.

See attached.

§126-13-13. - On-Site Reviews.

None

§126-13-14. - Capacity Building.

None

126-13-4

- ✓ A. New student achievement standards need to be developed and applied immediately.
- ✓ B. 4.1 The requirement that "no more than 15% of the students perform within the 1st quartile" is a complete misapplication of fair and proper comparison of West Virginia students with a norm sample that had 25% of students in each quartile, including the first. This requirement is not mathematically sound and subjects West Virginia schools and students to unfair requirements. I have repeatedly asked WVDOE personnel to explain the requirement but have found none who can do so. Perhaps I have not found the right person yet. Where did this requirement originate? If it is not right and not fair, get rid of it!
- ✓ C. 4.2 Including bus transportation interruption is an excellent idea! Where did it come from, where has it been? If we can determine its origin, could we consider sending 4.1 to this source for reconsideration?
- ✓ D. 4.3 Dropout rate should remain at 6%. Too many factors outside the school environment influence/control the dropout rate. Standards should not be raised to a higher level when the ability to control the dropout rate is not entirely within the scope and power of school personnel.
- ✓ E. 4.4 Including a test that is **entirely subjectively scored and requiring a score greater than 2** by 50% of the students is not fair, since a score of 2.5 is above the 50th percentile. This standard would require that 85% of students score at 2 or above. Since a score of 2 is the same as scoring at the 50th percentile, it is unrealistic for us to expect 85% of students to be above this mark.
- ✓ F. 4.5 Keep the rate at 90% as specified by the education goals of the state of West Virginia, as indicated in 2.4.4 goal # 4. We should try to be consistent when possible.

- ✓ G. 4.10 Schools are to be **held responsible** for student actions and decisions when the students are no longer under our guidance and control? Delete this section completely, or transfer it directly to the WVDOE. Perhaps WVDOE employees are better equipped to control the actions of high school students after graduation. Will we soon be assigned responsibility for students who are five years out of high school?
- ✓ H. 4.13 This requirement is not fair. We are requiring 60% of West Virginia students to score at a level that only 50% of the students in the norm sample. This does not compute mathematically.
- ✓ I. 4.14 30 % would be fair, 33% does not make mathematical sense.

126-13-5

- ✓ 9.4 Similar requirements should be implemented for teachers even though it is not required by statute.
- ✓ 10.8 **(Prior to the beginning)**. This is confusing. Are teachers expected to perform this analysis **before** they start to work each year? Perhaps this should read "before the beginning of school for students".
- ✓ 12.4 **leader** should be **leaders**
- ✓ 12.5 **leader** should be **leaders**

✓ 126-13-7.1 SAT 9 test scores are usually known by school personnel by mid-May. This date would allow approximately three weeks for school personnel to **close school** and also develop plans for the next school year. Most teachers are not employed after June 7 or 8. This change is most unrealistic.

✓ 126-13-10 Not only is it an **unsound educational procedure**, to label any school, principal, teacher or student "**seriously impaired**", borders on being a severe injustice, if not a "**crime**".

✓ 126-13-10, 126-13-11 If a school falls below standards, it is labeled "**seriously impaired**". If a county does not measure up to standards, it is given a "**nonapproval status**". It is grossly unfair to place such a damning label on schools and then refer to counties as "**nonapproved**". **Do not use the terminology "seriously impaired" at all.** Refer to schools that have not met standards as "**nonapproved**".

126-13-10 Although it has not been included as a possible change, this sentence should be changed to read "The West Virginia Board of Education **SHALL** determine" instead of "The West Virginia Board of Education **MAY** determine". The use of the word "may" indicates that there is a possibility that a school has a chance of not being labeled "seriously impaired" when, in actuality, this chance does not exist. It leads to false hope on the part of principals, teachers and students that consideration will be seriously given to not impose the label of "seriously impaired". (Review of the minutes of the State Board of Education will verify that the above statement is factual)

126-13-12.6.4 Who determines # 2?

Is there any possibility of a workable system of notification and due process being included in the accreditation process? It has been my experience that what is used now is not fair to schools in any way. We are required to abide by timelines and dates certain. Somewhere, someday, somehow there needs to be built into the O. E. P. A. process a method of making sure that that office is required to follow procedures similar to the ones that school administrators are required to follow when dealing with students and teachers. Fair is fair!

Donna Davis

From: Brenda Francis [bfrancis@access.k12.wv.us]
Sent: Tuesday, January 09, 2001 9:26 AM
To: dndavis@access.k12.wv.us
Subject: (policy 2320)

Dr. Davis,

Along with several other principals, I have reviewed the revised Policy 2320. Several concerns which came to mind are listed below.

126-13-4 "new student achievement standards will be applied that are based upon a value added approach." Value added approach is an unfamiliar term. How will these be measured?

5.1.9 "Instruction in writing..." Who determines which classes are appropriate?

6.1.. What is a curriculum audit? Will this require more paper work?

7.2 The June 15 date for the school USIP will require a great deal more paper work to be done at one of the busiest times of year. Doing test data analysis would be almost impossible since testing results are returned so near the end of school.

Brenda Francis, Principal
Kellogg Elementary School

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

JAN - 9

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Diana G. Zelenak

Position: Teacher

Name of County, School, Business, etc: Monongah Middle School, Marion Co.

Street Address: 550 Camden Ave

City/State/Zip: Monongah WV 26554

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

126-13-4 Annual Performance Measures: This adjustment of test scores for economic status of school is long overdue. Thanks for seeing the necessity.

4.1 page 5 Asking a school to perform above the fiftieth percentile in total basic schools is unrealistic and sets the school and state up for failure in the eyes of the public. Also the economic status of the school would preclude scores in the first quartile being higher than 15%. Therefore, we oppose the implementation of this change.

4.4 Setting a standard that is above average as the average--2.5 on the Writing Assessment test—is again extremely unrealistic and again sets the school and school system up for public ridicule. The current scores, particularly on the seventh-grade level, are no where near the proposed scores.

4.13. To change the requirements for graduation to the sixtieth percentile would encourage a higher dropout rate in the high school. Again why should we always expect West Virginia students to perform above average?

§126-13-5. - High Quality Standards.

5.2 The Unified County Improvement Plan and the Unified School Improvement Plan have to be completed so early that a distribution of resources based solely on the budget included in them would handicap the county and school, since it is impossible to project exactly what needs will need met during the whole school year. Thus, a reliance on these plans, usually completed in June, would seem an unwise thing to do.

§126-13-9. - Exemplary Accreditation Status.

Since American public schools have ideally tried to educate all the children of all the people in an equal and unbiased way, it would certainly seem a step backwards to start labeling schools as exemplary or average, making it appear as though students were getting an inferior education in some public schools, when, in reality, the status was achieved through the high economic status of the attendance area. Such an approach would surely lead to the voucher system, crippling the American education system.

§126-13-10. - Seriously Impaired Status.

§126-13-11. - School System Approval.

§126-13-12. - Nonapproval Status.

§126-13-13. - On-Site Reviews.

1344.3 Education performance audit teams should be made up, as they currently are, of active, working out-of-county personnel who are employed temporarily on an as-needed basis. These teams give greater insight into a county's problems because they daily try to do these same jobs themselves. They are not hired bureaucrats, who make it their duty to locate problems in order to keep their full-time job. Such teams would not come with the knowledge and empathy needed to evaluate fairly.

§126-13-14. - Capacity Building.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

JAN - 9

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: JOHN R. STRAIGHT

Position: TEACHER

Name of County, School, Business, etc: MONONGAH MIDDLE SCHOOL, MARION Co.

Street Address: RT. 2, 97 Husky Dr.

City/State/Zip: FAIRMONT, WV 26554

COMMENTS/SUGGESTIONS

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§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

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§126-13-14. - Capacity Building.

JAN - 9 .

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Kathy J. Starrett

Position: teacher

Name of County, School, Business, etc: Marion - Monongah Middle School

Street Address: 550 Camden St.

City/State/Zip: Monongah, WV 26554

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

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**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

JAN - 9

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Brenda K. Moore

Position: Media Specialist / social studies

Name of County, School, Business, etc: Monongah Middle / Marion County

Street Address: 550 Camden Avenue

City/State/Zip: Monongah, WV 26554

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

126-13-4 Annual Performance Measures: This adjustment of test scores for economic status of school is long overdue. Thanks for seeing the necessity.

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§126-13-14. - Capacity Building.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

JAN 9

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Individual/Organization: Anna L. Greco

Position: Teacher

Name of County, School, Business, etc: Monongah Middle School

Street Address: 550 Camden Ave

City/State/Zip: Monongah, WV 26554

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

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§126-13-14. - Capacity Building.

JAN 9

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Caral Drake

Position: 6th Grade Teacher

Name of County, School, Business, etc: Monongah Middle School (Marion County)

Street Address: 550 Comden Avenue

City/State/Zip: Monongah, WV 26554

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

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Comments/Suggestions**

JAN - 9

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Individual/Organization: Ruthanne Dean

Position: Counselor

Name of County, School, Business, etc: Monongah Middle, Marion Co

Street Address: 550 Camden Ave

City/State/Zip: Monongah W 26554

COMMENTS/SUGGESTIONS

§126-13-1. - General.

[Empty space for comments under §126-13-1. - General.]

§126-13-2. - Purpose.

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Comments/Suggestions**

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Individual/Organization: Roberla Absher

Position: Teacher 7+8 French + English

Name of County, School, Business, etc: Marion County

Street Address: 550 Camden Ave

City/State/Zip: Monongah, WV 26554

COMMENTS/SUGGESTIONS

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§126-13-3. - Responsibility.

126-13-4 Annual Performance Measures: This adjustment of test scores for economic status of school is long overdue. Thanks for seeing the necessity.

4.1 page 5 Asking a school to perform above the fiftieth percentile in total basic ^{skills} schools is unrealistic and sets the school and state up for failure in the eyes of the public. Also the economic status of the school would preclude scores in the first quartile being higher than 15%. Therefore, we oppose the implementation of this change.

4.4 Setting a standard that is above average as the average--2.5 on the Writing Assessment test—is again extremely unrealistic and again sets the school and school system up for public ridicule. The current scores, particularly on the seventh-grade level, are no where near the proposed scores.

4.13. To change the requirements for graduation to the sixtieth percentile would encourage a higher dropout rate in the high school. Again why should we always expect West Virginia students to perform above average?

§126-13-5. - High Quality Standards.

5.2 The Unified County Improvement Plan and the Unified School Improvement Plan have to be completed so early that a distribution of resources based solely on the budget included in them would handicap the county and school, since it is impossible to project exactly what needs will need met during the whole school year. Thus, a reliance on these plans, usually completed in June, would seem an unwise thing to do.

§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

§126-13-8. - School Accreditation Status.

Since American public schools have ideally tried to educate all the children of all the people in an equal and unbiased way, it would certainly seem a step backwards to start labeling schools as exemplary or average, making it appear as though students were getting an inferior education in some public schools, when, in reality, the status was achieved through the high economic status of the attendance area. Such an approach would surely lead to the voucher system, crippling the American education system.

§126-13-9. - Exemplary Accreditation Status.

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§126-13-10. - Seriously Impaired Status.

§126-13-11. - School System Approval.

§126-13-12. - Nonapproval Status.

§126-13-13. - On-Site Reviews.

1344.3 Education performance audit teams should be made up, as they currently are, of active, working out-of-county personnel who are employed temporarily on an as-needed basis. These teams give greater insight into a county's problems because they daily try to do these same jobs themselves. They are not hired bureaucrats, who make it their duty to locate problems in order to keep their full-time job. Such teams would not come with the knowledge and empathy needed to evaluate fairly.

§126-13-14. - Capacity Building.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

JAN - 9

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Monongah Middle School

Position: _____

Name of County, School, Business, etc: MARION

Street Address: 550 Camden Ave

City/State/Zip: MONONGAHL WV 26554

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

126-13-4 Annual Performance Measures: This adjustment of test scores for economic status of school is long overdue. Thanks for seeing the necessity.

✓ 4.1 page 5 Asking a school to perform above the fiftieth percentile in total basic ^{skills} schools is unrealistic and sets the school and state up for failure in the eyes of the public. Also the economic status of the school would preclude scores in the first quartile being higher than 15%. Therefore, we oppose the implementation of this change.

✓ 4.4 Setting a standard that is above average as the average—2.5 on the Writing Assessment test—is again extremely unrealistic and again sets the school and school system up for public ridicule. The current scores, particularly on the seventh-grade level, are no where near the proposed scores.

4.13. To change the requirements for graduation to the sixtieth percentile would encourage a higher dropout rate in the high school. Again why should we always expect West Virginia students to perform above average?

§126-13-5. - High Quality Standards.

✓ 5.2 The Unified County Improvement Plan and the Unified School Improvement Plan have to be completed so early that a distribution of resources based solely on the budget included in them would handicap the county and school, since it is impossible to project exactly what needs will need met during the whole school year. Thus, a reliance on these plans, usually completed in June, would seem an unwise thing to do.

§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

§126-13-8. - School Accreditation Status.

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§126-13-10. - Seriously Impaired Status.

§126-13-11. - School System Approval.

§126-13-12. - Nonapproval Status.

§126-13-13. - On-Site Reviews.

1344.3 Education performance audit teams should be made up, as they currently are, of active, working out-of-county personnel who are employed temporarily on an as-needed basis. These teams give greater insight into a county's problems because they daily try to do these same jobs themselves. They are not hired bureaucrats, who make it their duty to locate problems in order to keep their full-time job. Such teams would not come with the knowledge and empathy needed to evaluate fairly.

§126-13-14. - Capacity Building.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

JAN - 9

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Dr. Donna Martin

Position: Elementary Supervisor/Title I Co-director/Reading Supervisor

Name of County, School, Business, etc: Lincoln County Schools

Street Address: 10 Marland Avenue

City/State/Zip: Hamlin, WV 25523

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

✓ 4.4 Measure

Fifty percent is too high to start in year 2001/2002. Suggestion: 2001/2002 - 50% of students score at 2.0 or above; 2002/2003 - 75% of students score at 2.0 or above; 2003/2004 - 50% of students score at 2.5 or above.

✓ 5.12.3, 5.12.4, 5.12.5 - In 5.12.3 education leaders are administrators and teachers. Who is the education leader in 5.12.4 and 5.12.5? Principals? Or same as in 5.12.3? Suggestion: Clarify leader in 5.12.4 and 5.12.5.

§126-13-5. - High Quality Standards.

Raleigh County Schools

105 Adair Street, Beckley, WV 25801-3791 Ph. 304-256-4500 FAX 304-256-4707



TO: Dr. Donna Davis

FROM: Sheila Lucento

SUBJ: Comments on Proposed Policy 2320

DATE: January 9, 2001

126-13-4. – Annual Performance Measures

- ✓ 4.1 Since we have so little knowledge of value-added approach and how it might be implemented, I disagree with this change. Many of us are also fearful that when value-added is included, the requirement for 50% of students scoring above the 50th percentile will remain as well.
- ✓ 4.4 The Writing Assessment standard is too high. It is well above the state average at each grade assessed. Are we going to go into this policy with many more than half of our schools not meeting the standard?
- ✓ 4.10 How will "responding" graduates be defined? Will a percent of students who must respond be added later? This will be an expensive undertaking for our schools and county.
- ✓ 4.13 I agree with this change. Using total basic skills instead of reading language and math will make it much simpler to verify and many more students will be able to reach this. However, will the language in the certificate and warranty for students be changed to match?
- ✓ 4.15 How will the percent enrolled in advanced placement classes be calculated? This could be difficult to achieve especially at smaller schools.

Boone County Principals Association**Bruce W. Williams***President***P.O. Box 476****Whiteville, West Virginia 25209****(304) 854-1301*****WORLDWIDE FAX***Date: *1/9/01*To: *Dr. Donna Davis*From: *Bruce Williams*Subject: *Proposed Policy 2820 Comments*No. Pages Transmitted: *2 plus cover*

Boone County Principals Association

Bruce W. Williams

President

P.O. Box 476

Whitesville, WV 25209

304-854-1301

January 9, 2001

Dr. Donna Davis
Deputy Director
Office of Education Performance Audits
550 Eagan St., Suite 204
Charleston, WV 25301

Dear Dr. Davis:

The Boone County Principals Association wishes to bring to your attention a number of comments regarding the proposed Policy 2320. Those comments are as follows:

✓ ITEM: 126-13-4, 4.1. The value-added performance measures will be included and phased in as baseline data are available on the new statewide assessment.

COMMENT: It is our position that the value-added performance measures are not clearly defined and little understood. This should be removed from section 4.1.

✓ ITEM: 126-13-4, 4.4. Which requires that a minimum of fifty percent of the students score at or above 2.5 on the Writing Assessment...

COMMENT: It is our position that this standard be eliminated. We are of the opinion that the curriculum needs to be strengthened at the state level first, before implementing this standard. In addition, the Writing Assessment instrument is highly subjective and needs to be made more objective in nature.

✓ ITEM: 126-13-7, 7.1. and 7.2. This section changes the submission dates for the Unified School Improvement Plan at the county and school level.

COMMENT: It is our position that the current dates for submission of September 30th for schools and December 31st for boards of education remain in place and not be changed.

Page 2

We appreciate the opportunity to bring our concerns regarding the proposed changes to Policy 2320 to your attention. I know that you and your colleagues will take careful and deliberate time to review and consider our remarks. Should you have any questions regarding our comments, please give me a call at 854-1301.

Sincerely,

A handwritten signature in cursive script that reads "Bruce W. Williams".

Bruce W. Williams

Cc. BCPA Members

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Debra Berry / Shady Spring Elem. School

Position: Regular Education Teacher - 4th Grade

Name of County, School, Business, etc: Raleigh

Street Address: 600 Flat Top Road

City/State/Zip: Shady Spring, WV 25918

COMMENTS/SUGGESTIONS

§126-13-1. - General.

✓ I feel the standard of 2.5 on the Writing Assessment Test is too high of an expectation. I teach 4th grade and know how hard we work on writing skills. We have an excellent school and always achieve high test scores, but have never rated a 2.5 average on the writing test. Please reconsider the standard.

§126-13-2. - Purpose.

✓ I support the proposal to not count attendance of student absences when buses don't run. This does hurt our average and should not be counted.

**POLICY 2320: A Process for Improving Education •
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Tamira Stover

Position: Special Education Teacher 4-6th Grades

Name of County, School, Business, etc: Raleigh Co. / Shady Spring Elementary

Street Address: 600 Flat Top Road

City/State/Zip: Shady Spring, W. V.

COMMENTS/SUGGESTIONS

§126-13-1. - General.

I do not think the goal set of 2.5 for the Fourth Grade Writing Assessment is realistic for Accreditation purposes. Our school is one of the best in the county and have not scored close to the goal set for accreditation. The Writing Process, to do it correctly, takes a lot of class time, which is fine if we did not have to cover all the SAT9 objectives.

§126-13-2. - Purpose.

TO

Please submit comments by January 11, 2001 to:

Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagan Street, Suite 204
Charleston, WV 25301

FAX: (304) 558-2405

1-10-01

6 Pages including Cover

FROM:
Sarah Kendall
C/O Capital Community Ed.
Kanawha Co. Schools

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Sarah Kendall

Position: Psychologist

Name of County, School, Business, etc: Kennewick Bd. of Ed. - 200 Elizabeth St.

Street Address: 40 Capital Community Ed.

City/State/Zip: Charleston WV 25311

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

2.41 The word All is self-defeating + unrealistic
2.43 Given the current SES of our state, overall performance near
the 50th percentile might be possible - Exceeding 50th
percentile overall, may be setting ourselves up for failure

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

4.1 This is statistically unreasonable
We need to set statistically reasonable goals such
as 25% in 1st quartile, 25% in 2nd quartile, 25% in
3rd quartile, 25% in 4th quartile

4.4 Same as above

§126-13-5. - High Quality Standards.

5.10.3 Counselors are expected to spend far too much
time doing clerical tasks.

State-wide
Need mandated pupil/School Psychologist
ratios.

Need more School Psychologists in
State of NV

§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

§126-13-8. - School Accreditation Status.

§126-13-9. - Exemplary Accreditation Status.

§126-13-10. - Seriously Impaired Status.

10. | Seriously impaired status needs to take SES, consistency in schooling, etc... into consideration. All schools, students, families, communities, i.e. are not created equal. Sub inequalities are frequently exhibited in test scores + schools unfairly funded.

§126-13-11. - School System Approval.

§126-13-12. - Nonapproval Status.

§126-13-13. - On-Site Reviews.

§126-13-14. - Capacity Building.

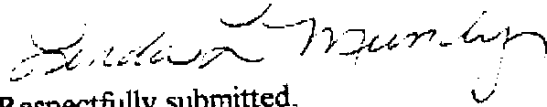
CLES - CONCERNS

2

For grades 4, 7 and 10, we would suggest an acknowledgment certificate for standards met or exceeded, or a certificate of improvement for schools whose students are showing improvement in two of the past three years of testing. The requirement of no more than 15% of students scoring in the lowest percentile is acceptable. How can the decrease be accurately documented with a new fourth grade school population each year?

Teaching appropriate writing skills requires practice and is as developmental as proficiency with reading skills. Are the standards being currently raised for students at the middle school and high school level? Are standards of clarity, organization, subjective analysis, etc. weighted more for older and more experienced students? What per cent of students in middle and high school score about the 2.5 standard? We would be interested in knowing the number of perfect writing scores at the elementary and secondary levels for the past school year. Please provide us with this data.

We trust our concerns have been appropriately communicated and that these areas will be seriously considered before standard 4.4 is approved as well as the entire Policy 2320 document.


Respectfully submitted,
Faculty Senate
Cross Lanes Elementary School

Cross Lanes Elementary School
5525 Big Tyler Rd.
Cross Lanes, WV 25313
304-776-2022
fax: 304-776-2029

FAX COVER SHEET

FAX NUMBER TRANSMITTED TO: (304) 558-2405

To: Dr. Donna Davis, Deputy Director
of Office of Education Performance Audits

From: Cross Lanes Elementary - Faculty Senate

Subject: Policy 2320 comment

Date: 01-10-01

DOCUMENTS	NUMBER OF PAGES*
Letter	2

COMMENTS:

* NOT COUNTING COVER SHEET. IF YOU DO NOT RECEIVE ALL PAGES, PLEASE TELEPHONE US IMMEDIATELY AT 304-776-4171.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Collins Middle School

Position: Fine Arts Team

Name of County, School, Business, etc: Fayette County

Street Address: 601 Jones Avenue

City/State/Zip: Oak Hill, WV 25901

COMMENTS/SUGGESTIONS

§126-13-1. - General.

✓ 2.4.3-"will show improvement" rather than "will improve by 50%" would be a more realistic statement. These are real people rather than machines.

§126-13-2. - Purpose.

Key 2320

Comments/Suggestion Form

Page 2

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

- ✓ 4.65-Needs to be extended to 8th Grade (K-8)
- ✓ 4.11-Parent involvement of 60% is unrealistic when you consider that many homes are single parent and many times the parent is working during school hours.
- ✓ 4.14-The percent is based on students tested, not students enrolled.
- ✓ 4.15-You cannot legislate intelligence or interest. This will encourage schools to lower standards to meet the percentage.
- ✓ 4.2-93% attendance is unrealistic. Parents are ultimately responsible for attendance.

§126-13-5. - High Quality Standards.

- ✓ 5.1.11-Add "appropriate" to read "all appropriate programs of study"

Madison Elementary School

1426 32nd Street
Parkersburg, West Virginia 26104
Phone 420-9563

To: Dr. Donna Davis

From: William W. Ingles
Principal – Madison Elementary, Wood County

Re: West Virginia State Board Policy 2320

Date: 1-10-01

✓ Dr. Davis I have reviewed the new standards for the West Virginia Performance Based Accreditation System. I have a few concerns that I would like to bring to your attention. My first concern is performance number 4.4 (50% of students must be assessed at 2.5 on the Writing Assessment). I feel that it should be 2.0 because the top of the scale is 4.0 and half of that is 2.0. My next concern is ~~7.2~~ 7.2 (schools USIP has to be completed by June 15). I feel the completion date of the USIP should remain on Sept. 30 because the June 15th deadline falls at the end of the school year. Principals are trying to close schools in June and to have a document of this size required at the same time of the year is not reasonable. Some time we do not receive test data for grades 1 & 2 until the day before school is out for the summer. Some principals do not have a 240-day contract and do not work in the summer.

Thank you for your time and if you have any additional questions please feel free to contact me at 420-9563 from 7 am till 3pm.

Midland Trail Elementary School

Principal
Joyce Embrey

200 Ferry Street
Belle, West Virginia 25015
Telephone: 304-949-1823

Secretary
Charlotte Perry

West Virginia Blue Ribbon School



National Blue Ribbon School



West Virginia School of Excellence

COVER SHEET

DATE: 1-10-01

TO: Dr. Donna Davis, Deputy Director

FAX# 304-558-2405

FROM: Midland Trail Elementary
Joyce Embrey, Principal

FAX# 949-1016 Call before you fax

6 PAGES WERE SENT

(INCLUDING THIS COVER SHEET)

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Midland Trail Elementary - Rosemary Bashon

Position: Faculty Senate President

Name of County, School, Business, etc: Kanawha County

Street Address: 200 Ferry St.

City/State/Zip: Belle, WV 25015

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

Policy 2320
Comments/Suggestion Form
Page 2

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

§126-13-5. - High Quality Standards.

✓ 5.7.9 The inclusion of writing as a part of every child's weekly curriculum will help raise the writing assessment scores in fourth grade and beyond. This is a welcome addition.

✓ 5.11.6 There needs to be a reassessment for the physical education requirements for school accreditation. There also needs to be a clear way to document and it needs

to be consistent statewide. Recommendations may come from Mr. John Ray's office at the State Board of Education.

✓ 5.1.13 Student progress needs to be clarified. Does this mean measures toward mastery of IGOs? or something else?

Policy 2320

Comments/Suggestion Form

Page 3

§126-13-6. - Indicators of Efficiency.**§126-13-7. - County and School Improvement Plan Process.**

76.1 These timelines are unrealistic in light of the time we get back test results from SAT 9. A more realistic due date would be December 1 for the county plan.

76.2 Timeline unrealistic. A better due date would be October 1 for the school plan. This would give the staff at least a month to analyze data and develop the plan.

§126-13-8. - School Accreditation Status.

Policy 2320

Comments/Suggestion Form

Page 4

§126-13-9. - Exemplary Accreditation Status.

Standards 9.1 and 9.4 are so high that it becomes almost impossible to reach. Would it not be more beneficial and make this standard more attractive to make it more attainable. For example 60% scoring above the 3rd quartile and 20% scoring above 2.5 rather than 3 on the writing assessment. Schools that are doing well should be recognized for it. Maybe a consideration should be given to 2 levels of exemplary status.

§126-13-10. - Seriously Impaired Status.**§126-13-11. - School System Approval.**

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

4.2 – The attendance rate for 2000-01 is 93%. Leave it at 93% instead of going backward to 92.5% and then up to 93%.

§126-13-5. - High Quality Standards.

5.6.16 – Using reading, writing and math for the warranty is not consistent with 4.13 and 4.14 which was changed to Total Basic Skills. Leave them all reading, writing and math – that tells us much more than a Total Basic Skills average.

5.9.2 – Excellence in Teaching – I cannot find this anywhere in Policy 2510. It needs to

be eliminated.

5.11.3 – Preventive Discipline and Student Involvement – The Responsible Student Program is not a preventive discipline program. This needs to be changed in code. The Respect & Protect Program is a preventive discipline program.

Policy 2320

Comments/Suggestion Form

Page 3

§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

JAN 10

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Anna Jarvis

Position: 6 1st GR Teachers

Name of County, School, Business, etc: Taylor CO

Street Address: 650 N. PIKE

City/State/Zip: GRAFTON WV 26354

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

2.43.1 What are the guidelines for "ready."

§126-13-3. - Responsibility.

✓ §126-13-4. - Annual Performance Measures.

(20 or less)
4.65 Research has shown that small class sizes at the elem. level (K-4) improves test scores and increases learning. State aid formula should be revised only to count CLASSROOM teachers ~~to~~ to # of students. People paid by federal funds should not be included and administrator should not be included in the teacher:student ratio.

§126-13-5. - High Quality Standards.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Barb Lewis

Position: K/2 Teacher

Name of County, School, Business, etc: Hillsboro School

Street Address: HC-64 Box 399

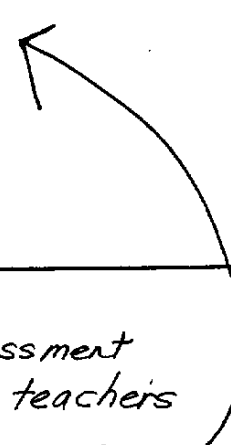
City/State/Zip: Hillsboro, WV 24946

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.



✓ §126-13-4. - Annual Performance Measures.

To achieve what you are asking on the Writing Assessment the state will need to provide training for all K-4 teachers in the Writing Process appropriate for their levels. Classroom teachers will need to include Writer's Workshops in their schedules each day. Schools that include these things already beginning in Kindergarten are not reaching your goals. You may need to look at the scoring process. If a score of 2 is given the most, this again will be impossible to achieve. It's easy to mandate these things, but difficult to carry them out.

§126-13-5. - High Quality Standards.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

JAN 10

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Scott Vingle

Position: Teacher

Name of County, School, Business, etc: Marion

Street Address: 200 Gaston Ave

City/State/Zip: Fairmont, WV

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

126-13-4 Annual Performance Measures: This adjustment of test scores for economic status of school is long overdue. Thanks for seeing the necessity.

4.1 page 5 Asking a school to perform above the fiftieth percentile in total basic schools is unrealistic and sets the school and state up for failure in the eyes of the public. Also the economic status of the school would preclude scores in the first quartile being higher than 15%. Therefore, we oppose the implementation of this change.

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§126-13-7. - County and School Improvement Plan Process.

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§126-13-9. - Exemplary Accreditation Status.

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§126-13-11. - School System Approval.

§126-13-12. - Nonapproval Status.

§126-13-13. - On-Site Reviews.

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§126-13-14. - Capacity Building.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

JAN 1 0

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: ~~###~~ Cheryl Nelson

Position: 3/4 teacher

Name of County, School, Business, etc: Hillsboro School

Street Address: Rt. 219

City/State/Zip: Hillsboro, WV 24946

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

✓ I would like to comment about Policy 2320's 4.4 about writing assessment scores. The proposed 50% of students at or above 2.5 is unrealistic for our student population. We do set high expectations, realistic ones, for our students. A proposed score of 2 would be more realistic and is a good average for student writing.

Also, the increase/decrease in 2 of 3 years isn't looking at the same students and isn't a valid assessment.

§126-13-4. - Annual Performance Measures.

§126-13-5. - High Quality Standards.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

JAN 10

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Donna Burns

Position: Dean of Students

Name of County, School, Business, etc: Hillsboro School

Street Address: HC-64 Box 399

City/State/Zip: Hillsboro, NV 24946

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-12. - Nonapproval Status.

I believe that moving the level of acceptability on the 4th & 5th grade writing assessment is a good idea. I believe that expectations have been too low for too long. However I believe that you must provide teachers with the tools to accomplish this goal. Professional development for K-4 teachers must be made available. The 4th grade teachers are expected to have students performing at this level without support of the students at all preceding grade levels.

§126-13-13. - On-Site Reviews.

§126-13-14. - Capacity Building.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

JAN 1 0

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Lass Mc Cutcherson

Position: Title I Reading Specialist

Name of County, School, Business, etc: Pocahontas - Hellsboro School

Street Address: HC 64, Box 399

City/State/Zip: Hillsboro, WV 24946

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

I have a concern that all K-2 ^{teachers} will not be trained to teach writing before the students are assessed in grades 3-5. Teachers must have training that is consistent for all grades.

Another area of concern is that the team assessing the Writing Assessment may be overly critical and have unreasonable expectations.

§126-13-4. - Annual Performance Measures.

§126-13-5. - High Quality Standards.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

JAN 10

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: BECKIE PARRISH

Position: TEACHER

Name of County, School, Business, etc: Monongah Middle

Street Address: 550 Camden Ave.

City/State/Zip: Monongah, WV 26570

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

126-13-4 Annual Performance Measures: This adjustment of test scores for economic status of school is long overdue. Thanks for seeing the necessity.

4.1 page 5 Asking a school to perform above the fiftieth percentile in total basic schools is unrealistic and sets the school and state up for failure in the eyes of the public. Also the economic status of the school would preclude scores in the first quartile being higher than 15%. Therefore, we oppose the implementation of this change.

4.4 Setting a standard that is above average as the average--2.5 on the Writing Assessment test—is again extremely unrealistic and again sets the school and school system up for public ridicule. The current scores, particularly on the seventh-grade level, are no where near the proposed scores.

4.13. To change the requirements for graduation to the sixtieth percentile would encourage a higher dropout rate in the high school. Again why should we always expect West Virginia students to perform above average?

§126-13-5. - High Quality Standards.

5.2 The Unified County Improvement Plan and the Unified School Improvement Plan have to be completed so early that a distribution of resources based solely on the budget included in them would handicap the county and school, since it is impossible to project exactly what needs will need met during the whole school year. Thus, a reliance on these plans, usually completed in June, would seem an unwise thing to do.

§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

§126-13-8. - School Accreditation Status.

Since American public schools have ideally tried to educate all the children of all the people in an equal and unbiased way, it would certainly seem a step backwards to start labeling schools as exemplary or average, making it appear as though students were getting an inferior education in some public schools, when, in reality, the status was achieved through the high economic status of the attendance area. Such an approach would surely lead to the voucher system, crippling the American education system.

§126-13-9. - Exemplary Accreditation Status.

Since American public schools have ideally tried to educate all the children of all the people in an equal and unbiased way, it would certainly seem a step backwards to start labeling schools as exemplary or average, making it appear as though students were getting an inferior education in some public schools, when, in reality, the status was achieved through the high economic status of the attendance area. Such an approach would surely lead to the voucher system, crippling the American education system.

§126-13-10. - Seriously Impaired Status.

§126-13-11. - School System Approval.

§126-13-12. - Nonapproval Status.

§126-13-13. - On-Site Reviews.

1344.3 Education performance audit teams should be made up, as they currently are, of active, working out-of-county personnel who are employed temporarily on an as-needed basis. These teams give greater insight into a county's problems because they daily try to do these same jobs themselves. They are not hired bureaucrats, who make it their duty to locate problems in order to keep their full-time job. Such teams would not come with the knowledge and empathy needed to evaluate fairly.

§126-13-14. - Capacity Building.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

JAN 10

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Twyla L. Rote

Position: Title I Instructor

Name of County, School, Business, etc: Marion Co. - Monongah Middle

Street Address: Camden Avenue

City/State/Zip: Monongah, WV 26555

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

126-13-4 Annual Performance Measures: This adjustment of test scores for economic status of school is long overdue. Thanks for seeing the necessity.

4.1 page 5 Asking a school to perform above the fiftieth percentile in total basic schools is unrealistic and sets the school and state up for failure in the eyes of the public. Also the economic status of the school would preclude scores in the first quartile being higher than 15%. Therefore, we oppose the implementation of this change.

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4.13. To change the requirements for graduation to the sixtieth percentile would encourage a higher dropout rate in the high school. Again why should we always expect West Virginia students to perform above average?

§126-13-5. - High Quality Standards.

5.2 The Unified County Improvement Plan and the Unified School Improvement Plan have to be completed so early that a distribution of resources based solely on the budget included in them would handicap the county and school, since it is impossible to project exactly what needs will need met during the whole school year. Thus, a reliance on these plans, usually completed in June, would seem an unwise thing to do.

§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

§126-13-8. - School Accreditation Status.

Since American public schools have ideally tried to educate all the children of all the people in an equal and unbiased way, it would certainly seem a step backwards to start labeling schools as exemplary or average, making it appear as though students were getting an inferior education in some public schools, when, in reality, the status was achieved through the high economic status of the attendance area. Such an approach would surely lead to the voucher system, crippling the American education system.

§126-13-9. - Exemplary Accreditation Status.

Since American public schools have ideally tried to educate all the children of all the people in an equal and unbiased way, it would certainly seem a step backwards to start labeling schools as exemplary or average, making it appear as though students were getting an inferior education in some public schools, when, in reality, the status was achieved through the high economic status of the attendance area. Such an approach would surely lead to the voucher system, crippling the American education system.

§126-13-10. - Seriously Impaired Status.

§126-13-11. - School System Approval.

§126-13-12. - Nonapproval Status.

§126-13-13. - On-Site Reviews.

1344.3 Education performance audit teams should be made up, as they currently are, of active, working out-of-county personnel who are employed temporarily on an as-needed basis. These teams give greater insight into a county's problems because they daily try to do these same jobs themselves. They are not hired bureaucrats, who make it their duty to locate problems in order to keep their full-time job. Such teams would not come with the knowledge and empathy needed to evaluate fairly.

§126-13-14. - Capacity Building.

**CROSS LANES ELEMENTARY SCHOOL**

5525 BIG TYLER ROAD, CROSS LANES, WV 25313

Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagen Street Suite 204
Charleston, West Virginia 25302

Dear Dr. Davis,

The teaching cadre of Cross Lanes Elementary School commends the Office of Education Performance Audits for advancements you have initiated in our educational system. However, Policy 2320 distresses us greatly. The contents of the policy and its implementation has prompted us to address our concerns in written form.

As astute professionals, we constantly monitor and evaluate our classroom teaching effectiveness. We have customized our lesson plan formats and documentation techniques to our teaching styles. We have done this in order to meet the learning and developmental needs of our students and to effectively communicate with their parents or guardians how they may effectively support their child's learning at home.

We feel that the proposed revisions of Policy 2320 are highly subjective and extremely laborious to complete. The magnitude of the documentation and the format to be employed will be immense. The time needed to complete the documentation will eliminate valuable classroom teaching time. It is not apparent to us as to how our creativity as planning teachers can be enhanced to benefit the students and the community that we serve with OEPA additional requirements for detailed documentation of performance standards.

An additional area which concerns us is with the Accreditation Standard 4.4. This requires that a minimum of 50% of our fourth grade students score at or above 2.5 on the Writing Assessment, or show an increase in two of the most recent three years, etc. (Effective 2001-2002).

We are not in disagreement for an assessment requirement but with the increased requirement of .5% at the elementary level. We would recommend that student progress be individually tracked from grade 4 to the assessments at grades 7 and 10. Growth will be noted and should increase at a minimum to the level of 3.0 with the tenth grade assessment.

The beginning of the writing assessment required 50% of the students achieve an established score of 2.0. With the raising of the standard proposed in this document, are we to understand that the score will be increased by .5% each year or every three years after 2002?

The classroom teachers from K-4 are professionals who teach appropriate writing skills developmentally, from emergent reader/writer status from Kindergarten to 4th. Do we choose the students who enter our classrooms or the doors of our school? We can teach all of the required skills with great diligence, but that will not necessarily ensure the students each fourth grade year will improve by .5% from the previous year. We feel that the level of 2.0 should be maintained as the base line data at the fourth level and increased by .5% at the seventh, and an additional .5% at the 10th grade.


CLES - CONCERNS

2

For grades 4, 7 and 10, we would suggest an acknowledgment certificate for standards met or exceeded, or a certificate of improvement for schools whose students are showing improvement in two of the past three years of testing. The requirement of no more than 15% of students scoring in the lowest percentile is acceptable. How can the decrease be accurately documented with a new fourth grade school population each year?

Teaching appropriate writing skills requires practice and is as developmental as proficiency with reading skills. Are the standards being currently raised for students at the middle school and high school level? Are standards of clarity, organization, subjective analysis, etc. weighted more for older and more experienced students? What per cent of students in middle and high school score about the 2.5 standard? We would be interested in knowing the number of perfect writing scores at the elementary and secondary levels for the past school year. Please provide us with this data.

We trust our concerns have been appropriately communicated and that these areas will be seriously considered before standard 4.4 is approved as well as the entire Policy 2320 document.


Respectfully submitted,
Faculty Senate
Cross Lanes Elementary School

HAYES JUNIOR HIGH SCHOOL

830 Strawberry Road
Saint Albans WV 25177
(304) 722-0222
FAX (304) 722-0247

Carla Williamson, Principal

Sherrie Davis, Assistant Principal

Cay Hoh, Counselor

FAX COVER SHEET

To: Hanna Davis, Deputy Director

Fax Number: 558-2405

From: Carla Williamson

Date: Jan 10, 2001

Re: Policy 2320

Comments: My personal comments

Pages (including cover sheet): 4

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Cathy Williamson

Position: Principal

Name of County, School, Business, etc: Hays Jr. High (Kansas)

Street Address: 830 Strawberry Road

City/State/Zip: St. Albans, Pt. 2 25177

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

Value Added Approach
Very positive change!

4.13 } Total Basic Skills score is much
4.14 } easier to work with. Often students
would exceed minimum level in
performance in only 2 of the 3
subjects & still exceed minimum level
in Total Basic Skills. This is clear & easy
to work with

§126-13-5. - High Quality Standards.

5.1.9 Please define "appropriate class"
Do not leave this to school personnel.
I believe writing is appropriate
in every class, but my teachers
would not agree.

5.10.12. I am so glad to see this requirement.
The data provided by ACT and SAT is so
valuable & many schools pay little or no
attention to that information.

§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

I do not believe June 15 is a realistic, or appropriate, due date for School USIPs. It is difficult for a school staff to address the administration of required SAT-9, the analysis of that data, individual educational planning, scheduling, transitioning, etc. while also experiencing staff reductions, school closures, transfers, personnel changes. While a school staff will be in the process of identifying goals based on needs assessed just semester, it would be more appropriate & effective to set an early Oct. due date. School can utilize all end of year data.

§126-13-8. - School Accreditation Status.

RESA-6



REGIONAL EDUCATION SERVICE AGENCY VI
Serving the Northern Panhandle

30 G. C. & P. Road
Wheeling, WV 26003

(304) 243-0440
Fax: (304) 243-0443

FAX COVER SHEET

To: Dr. Donna Davis

From: Dr. Bonnie Ritz

Date: January 10, 2001

Time: 2:30 p.m.

Fax Number

Number of Pages: 3
(Including this Cover Page)

If you do not receive all pages, please call the RESA-6 office at
(304) 243-0440.

Message:

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Individual/Organization: Dr. Bonnie Ritz/RESA-6

Position: Director of Programs and Support Services

Name of County, School: RESA-6

Street Address: 30 G. C. & P. Road

City/State/Zip: Wheeling, WV 26003

COMMENTS/SUGGESTIONS

Annual Performance Measures

- ✓ 4.2 The addition of an adjustment for the Productive and Safe Schools Act and school bus transportation interruptions is an improvement.
- ✓ 4.4 During the past three years, the West Virginia State Writing Assessment Score at all three grade levels (4, 7, 10) was below 2.5, the established level in standard 4.4. In 1999-2000, six counties scored at or above 2.5 in grade 10; none in grade 7; and none in grade 4. Although grade 4 had about 49 counties showing what may be called an increasing trend, only about 21 counties at grade 7 and 28 at grade 10 met the criteria. The writing assessment needs to be included in the standards, but requiring a minimum of 50% of the school's students to be at or above 2.5 and no more than 15% scoring below 2.0 needs to be reconsidered. The importance of effective writing can continue to be demonstrated using a standard requiring a minimum of 50% of students to score at or above 2.0. This would take into consideration any problems with the writing prompts or scoring issues.
- ✓ 4.3/
4.5 Combine the dropout rate and the graduation rate standards as they are indicators of identical measures and need not be two standards.
- ✓ 4.13/
4.14 The change to total basic skills is a reasonable, positive change to the standards.
- ✓ 4.15 Add college level classes to this standard — the percentage of students in grades 9 through 12 enrolled in advanced placement/honors classes and/or college level courses is at or above 5%.

High Quality Standards

5.10.6 Lesson Plans

Increasing the requirement for Principals' comments on lesson plans from each semester to each quarter is unnecessary. Each semester is adequate.

Be cautious that the inclusion of lesson plans based on approved IGOs is not interpreted to mean IGOs must be listed on plans.

Indicators of Efficiency

Add **may include** after curriculum delivery as distance learning may not be needed nor useful and should not be a requirement. As currently written, it is required.

6.1.1 Curriculum

Include the word **may** before "including satellite delivery and distance learning . . ."

6.1.6

Standard 6.1.6 is confusing and ambiguous. It is recommended that the standard state, "The county school system effectively participates with its assigned Regional Education Service Agency."

School Accreditation Status

There is no definition for full accreditation status for schools. All other definitions, including exemplary are provided. The definition of full approval for the entire county is provided.

Other Comments

When establishing the verifications for each standard, caution should be taken not to exceed the standard or create undue burden on schools or counties to meet the verification and documentation requirements.

UPSHUR COUNTY SCHOOLS

102 Smithfield Street
Buckhannon, West Virginia 26201
(304) 472-5480
Fax: (304) 472-0258

Mary Alice Klein,
Superintendent
Helen Whittehair,
Assistant Superintendent

Board of Education
Gary A. Frush, President
Donald E. Henderson, Vice President
Martha W. Feola
Diane N. Mcarns
Robert O. Rupp

F A X T R A N S M I S S I O N

TO: Deanna Davis
FROM: Mary Alice Klein
SUBJECT: Policy Comment
DATE: 1-10-01

We are faxing 3 pages (including this cover) to you:

- () for your information
- () at your request
- () for your comment

REMARKS:

UPSHUR COUNTY SCHOOLS

102 Smithfield Street P. O. Box 580
Buckhannon, West Virginia 26201
(304) 472-5480
Fax (304) 472-0258

Mary Alice Klein,
Superintendent

Helen Whitehair,
Assistant Superintendent

Board Of Education

Gary A. Frush, President
Donald E. Henderson, Vice-President
Martha W. Feola
Diane N. Mearns
Robert O. Rupp

January 10, 2001

Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagan Street, Suite 204
Charleston, West Virginia 25301

Dear Dr. Davis:

As President of the West Virginia Association of School Administrators, I wish to voice a concern about the ambiguity in Standard 6.16. I wish to go on record as supporting Standard 5.6.25 in the current version of West Virginia Board of Education Policy 2320 which states "The county school system effectively participates with its assigned Regional Education Service Agency."

This statement appears to be more appropriate than the recommended change. The proposed language in Standard 6.16 is very confusing and does not clarify responsibilities. It appears to shift responsibility to the school district for assessment of RESA services. This assessment occurs presently through the annual survey administered by RESA.

I recommend maintaining the emphasis of utilization of RESA services rather than assessment which is already a component of the present policy.

Thank you for your attention to this matter.

Sincerely,



Mary Alice Klein, Ed.D.
Superintendent

MAK/lmf

Enclosure

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

§126-13-5. - High Quality Standards.

I have concerns about the ambiguity in Standard 6.16. I support Standard 5.6.25 in the current version of WV Board of Education Policy 2320 which states "The county school system effectively participates with its assigned Regional Education Service Agency." This statement seems to be more appropriate than the recommended change. The proposed language in Standard 6.16 is very confusing and does not clarify responsibilities. It appears to shift responsibility to the school district for assessment of RESA services. This assessment occurs presently through the annual survey administered by RESA. I recommend maintaining the emphasis of utilization of RESA services rather than assessment which is already a component of the present policy.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Special Education Department

Position: Special Education Teachers

Name of County, School, Business, etc: Collins Middle School Fayette County

Street Address: 601 Jones Ave.

City/State/Zip: Oak Hill, WV 25901

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

2.4.1 through 2.4.6

Comment-Goals are lofty but unrealistic in light of varied abilities in individuals. Intelligent quotient scores can only change a few points (+ or -) regardless of intensive remediation or optimistic wishing. Individuals are created equal but intellectual abilities will never be.

Policy 2320

Comments/Suggestion Form

Page 2

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

4.2

Comment-Parents are responsible for a child's attendance in school. They are the ones who should be held accountable. It may be cost effective to hire in-school suspension teachers to reduce student absenteeism.

§126-13-5. - High Quality Standards.

5.4

Comment-Under other programs, Title 1 services need to be returned to all middle schools. Students who do not qualify for Special Education services are being denied academic assistance because a school must have a certain percentage of students receiving free lunch to have Title 1 programs. Middle and upper income students are not immune to the necessity for assistance in reading and math. This would seem to have the appearance of discrimination.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Kanawha County Secondary School Principals

Position: _____

Name of County, School, Business, etc: Kanawha

Street Address: 200 Elizabeth Street

City/State/Zip: Charleston, WV 25311

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

§126-13-5. - High Quality Standards.

5.1.9 ✓ Please define "appropriate class" and do not leave the school personnel confused with regard to what class is considered appropriate.

§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process. We do not believe June 15 is a realistic date. It is difficult for a school staff to address the administration of required SAT-9 testing, analyzation of the results, educational plans, scheduling, transitioning, etc. while also experiencing school closures, staff reductions, personnel changes, etc. While a school staff will be in the process of identifying needs & developing goals & target areas, it would be far more realistic & effective to have an early October due date for school USIPs. This date would allow the staff adequate time to make adjustments that reflect personnel changes & end of the year data collection.

§126-13-8. - School Accreditation Status.

HAYES JUNIOR HIGH SCHOOL

830 Strawberry Road
Saint Albans WV 25177
(304) 722-0222
FAX (304) 722-0247

Carla Williamson, Principal

Sherrie Davis, Assistant Principal

Cay Hoh, Counselor

FAX COVER SHEET

To: Donna Davis, Deputy Director

Fax Number: 558-2405

From: Kanawha County School Masters

Date: Jan. 10, 2001

Re: Policy 2320 Comments

Comments: _____

Pages (including cover sheet): _____

Mill Creek Intermediate School

8785 Winchester Avenue
Bunker Hill, West Virginia 25413
Phone 229 - 4570

Martha C. Grove, Principal

Kevin L. McBee, Assistant Principal

January 10, 2001

Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagan Street, Suite 204
Charleston, W.V. 25401

Dear Dr. Davis,

I am writing in regards to proposed Policy 2320. The line number of the policy is written prior to my comments.

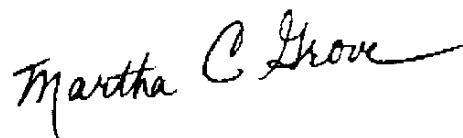
- ✓ 4.1 I have a concern about the "value added" performance measures. If I understand the phrase correctly, a team of people will be projecting areas where our schools need to improve without ever having been in our schools, reviewing our current populations, etc.
- ✓ 4.3 I believe that a 5% dropout rate is unrealistic. We are striving to assure that 50% of our students score in the top 2 quartiles on standardized tests and yet we try to keep 100% of high school students in school. We all realize, in this less than perfect society, that public high school education is not for all students. Some do better in vocational schools, or in the work place. Although we strive for these numbers, let's try to be realistic.
- ✓ 4.4 Again I believe the numbers of this performance measure are unrealistic. Although we try to get all students to a "4" level on the writing assessment, we are not all writers. I believe the average from 0.0 to 4.0 is a 2.0 not a 2.5. I also believe that 50% of the school's population is too large.
- 4.5 The concerns I have with graduation rate are the same as for the drop - out rate. I also would like to include that these two areas seem to necessitate an either or situation - either dropout or graduate. The other options of retention and death are not included.

7.1 and 7.2 I understand that the Unified School Improvement Plan may be required by June 15th or September 1st each year rather than September 30. Although I understand the need to plan early, many of the results of testing and attendance rates, etc are not available until the end of the school year. Teachers and staff members have too many items to take care of before they leave for the summer to wait until this information is available and then edit the plan. I can not want to require my staff to work over the summer to edit these plans and have them ready by September 1st. I believe that September 30th is an appropriate date.

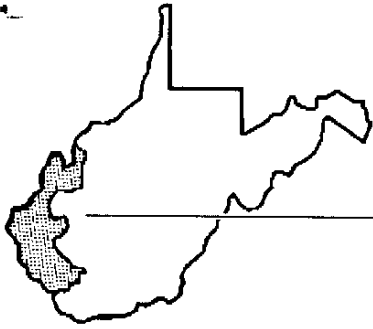
9.1, 9.2, 9.3 and 9.4 The criteria listed for exemplary schools are well above the capability for any middle or high school to achieve. Again, I feel this policy is unrealistic in nature. In an idealistic system, these would be appropriate.

Please do not misconstrue any of my comments. My school staff and I constantly strive to improve and would love for our school to meet all of the above standards. I am realistic enough, however, to know that we do not live in the "perfect" world. Thank you for reading my comments. If you would like any further clarification or comments, please contact me.

Sincerely,



Martha C. Grove, Principal



Regional Educational Service Agency, II

2001 McCoy Road, Huntington, WV 25701
Telephone: (304) 529-6205 Fax: (304) 529-6209

R.P. "Rick" Powell, Executive Director

January 10, 2001

Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagan Street, Suite 204
Charleston, WV 25301

Dear Dr. Davis:

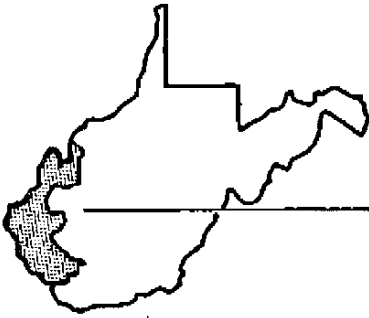
After considerable discussion with fellow RESA Executive Directors, it appears that the proposed standard 6.1.6 of WV State Board Policy 2320 is confusing and ambiguous as written. Therefore, I recommend the previous language as stated in Standard 5.6.25, "the county school system effectively participates with its assigned Regional Education Service Agency" be utilized for Standard 6.1.6.

Thank you for your time and due consideration of this matter.

Sincerely,

Rick P. Powell
Executive Director
RESA II

RPP/mjm



Regional Educational Service Agency, II

2001 McCoy Road, Huntington, WV 25701
Telephone: (304) 529-6205 Fax: (304) 529-6209

R.P. "Rick" Powell, Executive Director

THE FAX FOR YOU - FROM RESA II

TO: _____ Dr. Donna Davis, Education Performance Audits

FROM: _____ Rick P. Powell

SUBJECT: _____ Comment: Policy #2320

DATE: _____ 1/10/01

FAX NUMBER: _____ 304-558-2405

TIME: _____ 11 a.m. **NUMBER OF PAGES:** _____ 2
(Including cover page)

COMMENTS: _____

If you do not receive all pages, please call: (304) 529-6205

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Office Hours: Monday thru Friday - 8 a.m. to 4 p.m. Fax #: 529-6209

**Mt. Hope Elementary
408 Lincoln St.
Mt. Hope, WV 25880**

January 10, 2001

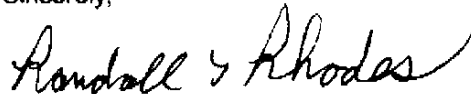
Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagan St., Suite 204
Charleston, WV 25301

Dear Dr. Davis

Please consider the following comments concerning Policy 2320:

- ✓ 4.2 Attendance rate is set too high 90% is attainable
- ✓ 4.4 The Writing Assessment criteria is unattainable. The Writing Assessment should not be considered as part of 2320.
- ✓ 4.14 President's Fitness Test should be eliminated as part of this process.
- ✓ 7.2 The date of June 15th for the U.S.I.P. is too early.
- ✓ 5.6.7 I agree that the verification of School Report Cards is not needed.

Sincerely,



Randall L. Rhodes
Principal, Mt. Hope Elementary School

**Regional Education Service Agency**

501 22nd Street, Dunbar, West Virginia 25064-1711
766-7655

FAX #766-7915

January 10, 2001

Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Egan Street, Suite 204
Charleston, WV 25301

Dear Dr. Davis:

The purpose of this letter is to comment on the proposed changes to WV Board of Education Policy 2320.

✓ The proposed changes reflected in standard 6.1.6 are confusing and ambiguous as written. It is difficult to determine whether it is meant to: 1) evaluate the degree to which the county system participates in RESA services; 2) let the county evaluate the services provided by their RESA or; 3) let the county suggest services for their RESA to provide.

Therefore, assuming the purpose of the standard is to measure the degree to which the county system participates in RESA services, I recommend the wording remain as it was in standard 5.6.25 before the revisions: "The county school system effectively participates with its assigned Regional Education Service Agency."

Respectfully Submitted,

A handwritten signature in cursive script that reads 'Charles Nichols'.

Charles Nichols, Executive Director
Regional Education Service Agency III



CAROL MORGAN
Executive Director

Regional Education Service Agency

205 New River Drive
Beckley, WV 25801
(304) 256-4712 Fax (304) 256-4683

January 10, 2001

Donna Davis
Deputy Director
Office of Education Performance Audits
550 Eagan Street, Suite 204
Charleston, West Virginia 25301

Dear Dr. Davis,

It is our opinion that the proposed standard 6.1.6 of WV Board of Education Policy 2320 is confusing and ambiguous as written. Therefore, we recommend that the standard state . . .

"The county school system effectively participates with its assigned Regional Education Service Agency."

Sincerely,

J. Kenneth Roberts, Chairman
RESA-I Board of Directors

Carol Morgan
Executive Director

dc

JAN 10

January 4, 2001

Beth Henry, 4th Grade Instructor
Flinn Elementary School
2006 McClure Parkway
Charleston, WV 25312

Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagen Street Suite 204
Charleston, WV 25301

Dr. Davis:

As a fourth grade teacher, I am alarmed at the recent news regarding setting a standard of 2.5 as an acceptable score of the Writing Assessment. To begin with, research has proven time and time again that students of higher economic standards score better on standardized tests than those of lower economic status. I teach at Flinn Elementary, which is not a Title I school, and therefore might be regarded as a higher status school. Our fourth grade average on the writing assessment, year after year, has been a solid 2.0. To "up" the expectation is, in my opinion, insulting to those of us who are working so hard to achieve a school average of 2.0! Heaven help those schools who have more struggling students than we have! Secondly, the criteria for scoring, while valid to some degree, cannot truly be objective, nor are some of the standards even developmentally appropriate for the average "young writer." Getting ten-year-olds to put their thoughts on paper in a concise manner is a difficult task. But to evaluate students on such a vast criteria while expecting most students to score a 2.5 is nearly an impossible task. This, I believe, puts incredible pressure on teachers and students alike, especially considering that many students at the 4th grade level are developmentally not ready to show proficiency in completing a paragraph using complete sentences with correct capitalizing and punctuation.

I don't feel that expecting the average ten-year-old to know about organization, development, sentence formation, word usage, and mechanics all under this rigid, subjective analysis is appropriate. My purpose here, other than merely to rant about why life's not fair, is to implore you to reconsider naming a standard of 2.5 on the Writing Assessment as the average score. Most of us are working as hard as we can.

Thank you,



Beth Henry, 4th Grade Instructor
Flinn Elementary

Policy 2320
Comments/Suggestion Form
Page 6

Please submit comments by January 11, 2001 to:

Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagan Street, Suite 204
Charleston, WV 25301

FAX: (304) 558-2405

Policy 2320

Comments/Suggestion Form

Page 2

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

The Attendance Rate can not be above 92.5% -

The drop-out rate should stay at 6%.

Berkley County can not effectively meet these two measures on a yearly base. The transient populations, the availability of jobs and the population growth give us unique problems that most areas of the state do not understand.

§126-13-5. - High Quality Standards.

POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions

JAN 11

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: R. Anne Lathen

Position: teacher /parent

Name of County, School, Business, etc: Fayette

Street Address: 218 Highland Ave.

City/State/Zip: Oak Hill, WV 25901

COMMENTS/SUGGESTIONS

§126-13-4. - Annual Performance Measures.

See attached, please.

Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagan Street, Suite 204
Charleston, WV 25301

Comments regarding proposed revisions of 126-13-4, specifically 4.4:

Long ago, my experience and training as a teacher and a parent led me to believe that the writing assessment would be a far better measure of educational performance than the standardized tests now in use. If students are truly being offered a quality education that will prepare them for college and beyond, they should be able to write a well-organized paper using standard English and observing conventions of the written language. Either this is not happening or the writing assessments are scored in a mysterious way. I have two children who are at the very top of their classes--4.0 GPA, 95th + percentile on SAT 9, Golden Horseshoe winner, participant in Johns Hopkins Talent Search, etc. However, neither of these highly motivated students has scored above 2.5 on the writing assessment. At every opportunity, I have asked teachers to emphasize writing because of my concern about the writing assessment scores and what they indicate to me. What I hear is that lack of time precludes real attention to writing. Therefore, as a parent, I would like to see the standardized test (SAT 9) **replaced** with the writing assessment as the primary measure of performance for at least the language arts.

As a first grade teacher, I devote a lot of time to writing, because I believe that it is important for students to learn to put share ideas on paper and because many students learn to read through writing. However, it is very frustrating to see my students struggle with the language arts portion of the SAT 9, because it is not well correlated to real writing experiences. As a teacher, I make a professional decision about what will best serve my students--learning to write or doing well on a standardized test. Given the pressure on teachers, principals, schools, and counties to produce SAT 9 scores, it is not surprising that activities more closely aligned with the standard test get the lion's share of language arts time and writing is often not given the time it deserves. Just last month, as we were being trained to use the new basic skills computer program, it was suggested that if time was short "most teachers skip the writing parts of the lessons." The message is very clear!

Using the writing assessment as the **primary** performance measure of language arts achievement would certainly validate my position that writing is more important than the SAT 9. However, to do so without some changes would be counterproductive.

- ❑ The writing assessment should **replace** the Sat 9 as a performance indicator so teachers can devote sufficient time to writing. If students write proficiently, they have demonstrated their command of the language arts.
- ❑ The scoring **procedure needs some attention**--more graders/paper, better feedback including return of the piece with a completed rubric and/or explanation of the average score, inclusion of the vast majority of language teachers in the scoring process so **all** affected teachers are familiar with the process and expectations.
- ❑ The proposed 50% of students scoring 2.5 or above is unrealistic, at least initially. The language used in the feedback from previous writing assessments indicates that at the 2.5 level there is substantial mastery and a few areas that need improvement. This

does not sound like a minimally acceptable score as the proposed change indicates. **A score of 2.0 for 50% of students is much more realistic.**

- The Department of Education could and should offer on-line tutorials for students wishing to improve their own writing. We receive many offers for such expensive products, but if writing is something West Virginia values, why not make it easily available. As a parent, I would find it much more attractive than Test Best booklets!

I will be interested to see the final version of the proposed changes and appreciate the opportunity to add my views for your consideration.


Anne Lathen

Please submit comments by January 11, 2001 to:

**Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagan Street, Suite 204
Charleston, WV 25301**

FAX: (304) 558-2405



CROSS LANES ELEMENTARY SCHOOL

5525 BIG TYLER ROAD, CROSS LANES, WV 25313

JAN 11

January 8, 2001

Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagen Street, Suite 204
Charleston, WV 25301

Dear Dr. Davis:

As a principal for the past twenty-six years and having represented West Virginia as a National Distinguished Principal, I have serious concerns about Policy 2320. The documentation that is now required for an on-site review is substantial and extremely time consuming. Every year we have to file and refile folders that document the standards. Each year more documentation is required.

This takes away from the time principals can serve as curriculum leaders. There is only so much time in a week and I am spending approximately seventy-five hours a week at school. This affects my ability to work with children, parents and staff in creating a caring, nurturing, safe and creative environment

Surely the standards can be simplified and the documentation reduced significantly. This policy, along with other state policies, is causing principals to want to leave education. Good perspective principals do not want the job because of the additional paper work and responsibilities. Would you?

As to standard 4.4, you are requiring more additional responsibilities for documentation without removing any existing time requiring documentation.

The standard 7.2 changes the USIP due date to June 15. Principals will not have sufficient time to review and analyze the spring test data. This also is the approximate date in which principals are required to complete a multitude of forms for our county school system. Principals should be employed during the summer to complete this task.

Sincerely,

James P. Brannon
Principal

CC: Dr. David Stewart
CC: Dr. Ron Duerring

P.S. Anytime a state policy is up for review, every school should be notified by e-mail that there is a policy currently being reviewed and directed to the correct home page.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Connie Lilly

Position: 3rd grade teacher

Name of County, School, Business, etc: Shady Spring Elem. Raleigh County

Street Address: _____

City/State/Zip: Shady Spring WV

COMMENTS/SUGGESTIONS

§126-13-1 - General

I have taught 4th grade and I feel that a 2.5 requirement is expecting too much. 2.0 is an average score and I don't think we should require a score above average.

§126-13-2 - Purpose

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Patsy Hill

Position: Teacher (3rd Grade)

Name of County, School, Business, etc: Shady Springs Elem. - Raleigh Co.

Street Address: RR 85, Box 90A

City/State/Zip: Jumping Branch, WV 25969

COMMENTS/SUGGESTIONS

§126-13-1. - General.

✓ Re: 4th Grade Writing Assessment

A score of 2.5 on the 4th Grade Writing Assessment is realistic as a goal but not as a requirement.

§126-13-2. - Purpose.

Chandler Elementary School
School for the Arts
1900 School Street
Charleston, WV 25312
304 348-1902

JAN 11

"The Place Where Students Come to Learn"

Genene Gourley
Principal

Drema Rucker
Secretary

01-10-01

Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagen Street, Suite 204
Charleston, WV 25301

Dear Dr. Davis:

I have been a principal for four years. I have had other administrative positions for the Kanawha County Schools System. I was a Special Education Specialist for twelve years. The position of principal is extremely difficult, especially in a school such as ours with 90% free and reduced lunch. I spend an inordinate amount of time working directly with students and parents regarding discipline. The documentation that is now required for an on-site review is substantial and time consuming. Each year more documentation is required.

As you know, this takes time that could be utilized in facilitating the development of curriculum and addressing curricular issues. I would ask that the standards be scrutinized to examine ways to streamline to reduce documentation and the amount of time needed to fulfill the requirements. The position of principalship can be a very rewarding and attractive one, however, with the accountability now expected of principals it is becoming more difficult to entice new and competent people into the field.

Standard 4.4 requires additional responsibilities for documentation without deleting existing requirements. The standard 7.2 changes the USIP due date to June 15th. Principals will not have sufficient time to review and analyze the spring test data. This is the approximate date in which principals are required to submit a great amount of data to our county school system. Principals should be employed during the summer to complete these assignments.

Sincerely,



Genene Gourley
Principal

Dr. David Stewart
Dr. Ron Duerring

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Debbie Bowman / Shady Spring Elem.

Position: teacher of gifted

Name of County, School, Business, etc: Raleigh Co.

Street Address: PO Box 2009

City/State/Zip: Shady Spring, WV 25918

COMMENTS/SUGGESTIONS

§126-13-1. • General

✓ I believe that all schools should be required to score at least average or 2.0 for the fourth grade writing assessment. It is a very difficult assessment tool - schools scoring above average should be considered for exemplary status.

§126-13-2. • Purpose.

PIKESIDE LEARNING CENTER

2140 Winchester Pike
Martinsburg, WV 25401

(304) 267-3555 Telephone
(304) 267-3557 Fax

FACSIMILE COVER SHEET

Date: 1/11/01

To the Attention of: Dr. Donna Davis
Deputy Director
Office of Education Performance Audits

From: Ken Beale
Principal

Number of Pages to Follow: 4

Special Instructions or Comments: Policy 2320
Comments

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: KEN ZEALE
 Position: PRINCIPAL
 Name of County, School, Business, etc: BERKELEY CO. PIKESIDE LEARNING CENTER
 Street Address: 2140 WINCHESTER PIKE
 City/State/Zip: MARTINSBURG, WV 25401

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

✓ Goal 3 and Goal 4
 Goal 3 - This sounds good, but in reality is almost impossible to achieve for many low functioning students.
 Goal 4 - Again, this sounds great, but many students need some type of modified diploma and to focus on learning vocational or other job skills programs for them to be successful in life. Many drop out because they become frustrated, not being able to meet the rigorous demands placed on them.

Policy 2320

Comments/Suggestion Form

Page 2

§126-13-3. Responsibility.

I never hear anything positive about the complete school accreditation process in talking with teachers and administrators throughout the State. This is usually the case when legislation or mandates from above are thrown upon the backs of teachers and administrators. I feel the entire process needs revamped from the ground up instead of vice versa.

§126-13-4. Annual Performance Measures.

These requirements for performance measures are almost impossible for the type of school we have where 100% of our students are at risk and have scored below the 50% ile in one or more of the total basic skills areas. We are an alternative school, but not for discipline students. Our small size also makes it nearly impossible to meet the attendance rates. The 2.5 standard on the Writing Assessment will again be practically impossible for our students to meet.

§126-13-5. High Quality Standards.

Alternative schools that are not discipline schools need more flexibility with curriculum, instructional time and almost every other area, in order to develop innovative and exemplary programs that are models in the state and across the nation. We have a top notch program in our school, but one size shoe does not fit everyone. If we have to meet every exact standard I fear our "Thinking outside the Box" school will become history.

The State Board or Legislature should eliminate the inequality among Principals attending the Principals Academy. Principals on a 201 day contract are paid their regular salary while Principals like myself and others on a 210 day contract are not paid the same, but are required to attend.

§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

The school improvement plan should be submitted every two or three years instead of annually. This is an example of how teachers and administrators get swamped with paperwork instead of teaching and being in teachers classrooms.

✓

§126-13-8. - School Accreditation Status.

✓ *Eliminate the exemplary accreditation status. Too few schools will be able to meet the criteria.*

§126-13-12. - Nonapproval Status.

§126-13-13. - On-Site Reviews.

✓ Eliminate or change - They have some merit but on the whole - from my experience and from numerous others I have talked to, they are a waste of time and money.

§126-13-14. - Capacity Building.

Boone County Principals Association

Bruce W. Williams
President
P.O. Box 476
Whitesville, WV 25209
304-854-1301

JAN 11

January 9, 2001

Dr. Donna Davis
Deputy Director
Office of Education Performance Audits
550 Eagan St., Suite 204
Charleston, WV 25301

Dear Dr. Davis:

The Boone County Principals Association wishes to bring to your attention a number of comments regarding the proposed Policy 2320. Those comments are as follows:

✓ ITEM: 126-13-4, 4.1. The value-added performance measures will be included and phased in as baseline data are available on the new statewide assessment.

COMMENT: It is our position that the value-added performance measures are not clearly defined and little understood. This should be removed from section 4.1.

✓ ITEM: 126-13-4, 4.4. Which requires that a minimum of fifty percent of the students score at or above 2.5 on the Writing Assessment...

COMMENT: It is our position that this standard be eliminated. We are of the opinion that the curriculum needs to be strengthened at the state level first, before implementing this standard. In addition, the Writing Assessment instrument is highly subjective and needs to be made more objective in nature.

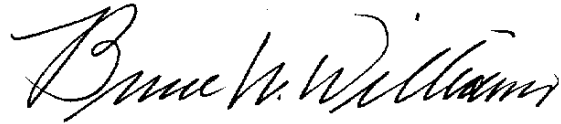
✓ ITEM: 126-13-7, 7.1. and 7.2. This section changes the submission dates for the Unified School Improvement Plan at the county and school level.

COMMENT: It is our position that the current dates for submission of September 30th for schools and December 31st for boards of education remain in place and not be changed.

Page 2

We appreciate the opportunity to bring our concerns regarding the proposed changes to Policy 2320 to your attention. I know that you and your colleagues will take careful and deliberate time to review and consider our remarks. Should you have any questions regarding our comments, please give me a call at 854-1301.

Sincerely,

A handwritten signature in cursive script that reads "Bruce W. Williams". The signature is written in black ink and is positioned above the printed name.

Bruce W. Williams

Cc. BCPA Members

JAN 1

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Anna Jarvis
Position: Kindergarten Teachers - 5 teachers
Name of County, School, Business, etc: Taylor Co
Street Address: 1650 N. Pike
City/State/Zip: Grifton WU 26354

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

2/43 Goal 1. What determines being ready?
Goal 3. Academic performance should be measured daily + not on a "one time" assessment.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

✓ 4.4 Unrealistic for students ^{who} are not motivated. (Why do not care & how do you make them care?)

✓ 4.6.5 20 students per teacher is way too high especially in a county where students have almost no pre-school experience.

§126-13-5. - High Quality Standards.

✓ 5.4 also needed - alternative behavior setting room for students who are behavior problems in the regular classroom.

• Gifted Program needs to be strengthened.

✓ 5.10.36 more Counselors needed!

✓ 5.10.69 County exceeds this goal?

§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

Schools should be given time to write plans. Teachers should not be ~~waited~~ expected to stay afterwards without getting paid

Way too much overtime not compensated for.

No. 1. 1 Increased technology (computers)

§126-13-8. - School Accreditation Status.

JAN 11

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320. A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Anna Jarvis

Position: Principal

Name of County, School, Business, etc: Taylor Co

Street Address: 650 N. Pike St

City/State/Zip: Grafton, WV 26354

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

Please clarify "adequate level of appropriately managed resources".
Is 2.2 part of the Unified Plan? How evaluated?
243.1 Goal What does it actually mean that students entering for the first time will be ready? We need more counselors to help with emotionally disturbed children as a result of problems at home. We need smaller numbers in K+1.
243.2 Goal 2 How will this be equal throughout the state? The formula has to change.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

What is value added approach + who determines it?

Attendance rate may be hard to attain if there is an epidemic or ~~Chicken~~ ^{flu} etc.

A.4 We would like baseline data statewide before commenting too much on this. Would 2. be more realistic instead of 2.5? 1.5 instead of 2. at 15%?

A.65 These numbers are too great for elem level in order to appropriately est. basics. Members determine how we keep students. We often lose students to neighboring Counties.

§126-13-5. - High Quality Standards.

5.5.1 Does not having adequate cafeteria space qualify here? We have to have P.E. in the Commons Area outside Kindergarten Classrooms

5.5.34 More health services are needed to rural schools that have few/small numbers of students with no full time nurse.

5.10.36 More counselors are needed to assist at risk students in order to have safer schools + more success academically for all students.

5.11 More Counselors are needed for safer schools as stated in 5.10.36

5.9.46 Principals contracts should be extended to where principals are paid for meetings they are required to attend.

5.10.8 We need time to analyze data.

5.10.10 There needs to be time to do meetings.

§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

✓ Schools should be given time to write whatever plans are required. Teachers should not be expected to stay after hours without pay. The burden always falls on a handful.

§126-13-8. - School Accreditation Status.

JAN 11

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Anna Jarvis

Position: Counselor

Name of County, School, Business, etc: Taylor Co

Street Address: 650 N Pike

City/State/Zip: BRAFTON WV 26354

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

243.1 Goal 1: Students entering first grade will be ready to learn. As the school counselor I am becoming more & more amazed at the increase in the number of at risk students entering our kindergarten classes. We need to increase the number of counselors at the elementary level (1:300 students). Children are not able to learn if they are from highly dysfunctional environments. We have to provide some preventive type programs and assistance for them and their families...

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

§126-13-5. - High Quality Standards.

5.11 - Safe schools issue. This is another area that needs to be addressed regarding the increase in elementary counselors. There are so many needy students and many concern areas. One counselor/625 students is unable to properly and adequately handle the needs of this population.

FAX TRANSMISSION

Date: 1/11/01 Number of pages including cover sheet 7



JACKSON COUNTY SCHOOLS

BOARD OF EDUCATION - OFFICE OF THE SUPERINTENDENT

P. O. BOX 770, RIPLEY, WEST VIRGINIA 25271

TELEPHONE: (304) 372-7300

FAX #: (304) 372-7312

To: WV Dept. of Education

Fax No.: 558-2405

Attn: Dr. Donna Davis, Deputy Director

Sent by: Ronald E. Ray, Superintendent

Comments:

CONFIDENTIALITY NOTICE: The documents accompanying this facsimile message may contain confidential information intended only for the use of the individual or entity named above. All information transmitted is intended only for the use of the above named recipient. If the reader of this message is not the intended recipient, you are hereby notified that you are not authorized to read, disclose, copy, distribute, or take any action other than immediate delivery to the named recipient. If you have received this communication in error, do not read the information and please immediately notify us by telephone to arrange for a return of the original message to us at the above address via the U.S. Postal Service. If you are the named recipient you are not authorized to reveal any of this information to any unauthorized person and are hereby instructed to destroy the information when no longer needed. If you did not receive all pages listed or if pages are not legible, please immediately notify the sender by telephone at (304) 372-7300. Thank you for your cooperation in this matter.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Ronald E. Ray

Position: Superintendent

Name of County, School, Business, etc: Jackson County

Street Address: P.O. Box 770

City/State/Zip: Ripley, WV 25271

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

Policy 2320**Comments/Suggestion Form****Page 2****§126-13-3. - Responsibility.****§126-13-4. - Annual Performance Measures.**

- ✓ 4.2 It would be difficult to adjust for bus interruptions. I do not believe that excessive time should be utilized to determine the impact of this.
- ✓ 4.3 The dropout rate is too low. Six percent has been a workable standard.
- ✓ 4.4 Standards such as this are arbitrary and lack an understanding of the term average.
- ✓ 4.5 Since the graduation rate is the inverse of the dropout rate, and the dropout rate is set too low, the graduation rate is too high.
- ✓ 4.8 This should be moved to the Personnel Section 5.8.

§126-13-5. - High Quality Standards.

Policy 2320

Comments/Suggestion Form

Page 3

§126-13-6. - Indicators of Efficiency.

7.2 No due date for School and County Unified Improvement Plans is going to be acceptable to everyone. However, counties should at least be asked and a date decided upon by a majority.



§126-13-7. - County and School Improvement Plan Process.

§126-13-8. - School Accreditation Status.

Burke Street School

422 W. Burke St.
Martinsburg, WV 25401

Phone (304) 267-3525
Fax (304) 267-3527

FAX

DATE: 1/11/01

TO: Dr. Donna Davis
FAX NUMBER (304) 558-2405

FROM: Dr. Waverly - Principal

NUMBER OF PAGES (INCLUDING COVER PAGE) ~~1~~ 2

SUBJECT:

Policy 2320 - Comments

Policy 2320**Comments/Suggestion Form**

Page 2

§126-13-3. - Responsibility.**§126-13-4. - Annual Performance Measures.**

4.3 Drop out rate - as a former high school principal, I feel that the 5% drop out rate / 95% graduation rate are unrealistic goals.

4.4 Writing Assessment goals are too strict. $\geq 50\%$ above 2.0 and $\leq 15\%$ below 1.0 would be in line with the SAT 9 requirements.

§126-13-5. - High Quality Standards.

FAX COVER SHEET

WAYNE COUNTY BOARD OF EDUCATION
P.O. BOX 70, 212 NORTH COURT STREET
WAYNE, WEST VIRGINIA 25570

Telephone: 304-272-5116

FAX: 304-272-6500

**FROM THE OFFICE OF
JIM HALE
ADMINISTRATIVE ASSISTANT**

TO: Donna Davis

FAX NO: 304-558-2405

DATE: January 11, 2001

NUMBER OF PAGES (including cover page) 3

Comments: Hard copy will follow.



WILTS SALMONS
SUPERINTENDENT

WAYNE COUNTY BOARD OF EDUCATION

POST OFFICE BOX 70

WAYNE, WEST VIRGINIA 25570-0070

TELEPHONE: (304) 272-5116

FAX: (304) 272-6500

The following comments on Policy 2320 were made by the Wayne County Schools central office curriculum team:

126-13. On-Site Reviews

13.3

The added wording will help to ensure consistent audits and provide OEPA more credibility among LEA's. We strongly suggest this wording remain and funding be provided.

As a side suggestion, counties should be provided with specific details when citations are given at the school level by the audit team. They should provide the name of the teacher and the standard found to be in non-compliance. It is difficult to address a NC with just "a student was found sleeping in class at a certain school." Any questions the audit team may have should be discussed/checked with the building level administrator before leaving the site. Many times the problem could be addressed at that time.

126-13-4. Annual Performance Measures

4.1.

The term "value-added performance measures" needs to be defined in more detail.

4.4.

The effective date should be no sooner than 2003-2004.

4.5.

Increases in graduation rate should be gradual and phased in rather than going from 90% to 95%.

4.6.

The following wording should remain: "provided that exemption requests to obtain these maximum ratios are waived in schools where the schoolwide pupil teacher ratio does not exceed 25 to 1 in grades 1 through 6.

4.11

A specific and consistent method of calculating the percentage of parent involvement should be provided. When an audit team member is ask how it should be calculated, they give a vague, inconsistent response. Schools in the same county have been both cited and commended for using the same method.

4.15.

We agree that the percentage of students in grades 9-12 enrolled in advanced placement and/or honors classes should be at or above 5% but would like to expand the standard to include post secondary classes that are also taken in these grades.

5.10. Student and School Performance

5.10.6

Lesson plans should be reviewed and commented on a minimum of once each semester NOT changed to once each quarter. Schools with large or less experienced staff members would get nothing done but observations, evaluations and checking lesson plans.

126-13-6. Indicators of Efficiency

We feel this entire section ~~needs~~ more explanation and clarification.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Suzann Murphy

Position: Principal

Name of County, School, Business, etc: Pruntytown Elementary - Taylor

Street Address: Rt #2 Box 158V

City/State/Zip: Grafton, WV 26354

COMMENTS/SUGGESTIONS

§126-13-1. - General.

✓ ok

Is this policy being presented to the State Legislators for information so that adequate funding can be provided to meet the standards?

✓
§126-13-2. - Purpose.

A clarification is needed to determine what is an "adequate level of appropriately managed resources."

2.2 Is evaluation of needs part of the Unified Plan and if so how is it to be evaluated?

Goal 1: Is there a standard for first graders to be ready? What does this mean (their six by Sept. 1)? Children are coming with personal burdens from home; more counseling services are needed to help.

Goal 2: How will this be equal statewide, or county wide? Is the formula going to change?

§126-13-3. - Responsibility.

✓ *ok*

§126-13-4. - Annual Performance Measures.

- ✓ What is meant by a value-added approach? This needs more explanation. As for absences, there is no flexibility allowing for small children entering school for the first time. Often young students are exposed to many illness their first year.
- ✓ 4.4 Without seeing statewide data on writing assessment I feel that this 2.5 standard is not realistic.
- ✓ 4.6 This standard is hurting our county student enrollment count because we are turning away students to other counties to meet this standard – an allowance needs to be made for grades 1-3 or increase funding for smaller class sizes.

§126-13-5. - High Quality Standards.

- ✓ 5.5.1 Who determines this, will the state provide funds for corrective measures?
- ✓ 5.534 Health services are very minimal, half a day, once a month is all my school receives. Is that considered adequate? This area too needs funding for county schools
- ✓ 5.9.46 No other profession has to work without pay if it is a requirement. Or are we not professional?
- ✓ 5.1036 Having a counselor half a day once a week does not meet the needs of the students. This service needs increased for students to be successful and have a safe environment.
- ✓ 5.10.8 Because of the school calendars, not enough time is allotted to analyze test data at the beginning of the school year. There is enough just to get school under way.
- ✓ 5.10 Once again more help is needed if this is to be obtained.

- ✓ 5.10.10 SAT are very much needed and established but again no time is allotted When there are no planning times available, the county has to spend substitute monies to provide time and there is no reimbursement from the state to meet this need.

§126-13-6. - Indicators of Efficiency.

✓
ok

§126-13-7. - County and School Improvement Plan Process.

✓

Schools should be given time to write this large comprehensive plan it is to be successful and not just another duty because it is required. Again are we not professionals? We are already taking away planning time to have SAT meetings, IEP meeting and curriculum meetings there always seems to be something.

§126-13-8. - School Accreditation Status.

✓
ok

§126-13-9. - Exemplary Accreditation Status.

ok



§126-13-10. - Seriously Impaired Status.



ok

§126-13-11. - School System Approval.



ok

§126-13-12. - Nonapproval Status.

✓
ok

§126-13-13. - On-Site Reviews.

✓
ok

§126-13-14. - Capacity Building.

✓
ok

UPSHUR COUNTY SCHOOLS

102 Smithfield Street P. O. Box 580
Buckhannon, West Virginia 26201
(304) 472-5480
Fax (304) 472-0258

JAN 12

Mary Alice Klein,
Superintendent

Helen Whitehair,
Assistant Superintendent

Board Of Education

Gary A. Frush, President
Donald E. Henderson, Vice -President
Martha W. Feola
Diane N. Mearns
Robert O. Rupp

January 10, 2001

Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagan Street, Suite 204
Charleston, West Virginia 25301

Dear Dr. Davis:

As President of the West Virginia Association of School Administrators, I wish to voice a concern about the ambiguity in Standard 6.16. I wish to go on record as supporting Standard 5.6.25 in the current version of West Virginia Board of Education Policy 2320 which states "The county school system effectively participates with its assigned Regional Education Service Agency."

This statement appears to be more appropriate than the recommended change. The proposed language in Standard 6.16 is very confusing and does not clarify responsibilities. It appears to shift responsibility to the school district for assessment of RESA services. This assessment occurs presently through the annual survey administered by RESA.

I recommend maintaining the emphasis of utilization of RESA services rather than assessment which is already a component of the present policy.

Thank you for your attention to this matter.

Sincerely,



Mary Alice Klein, Ed.D.
Superintendent

MAK/lmf

Enclosure

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

§126-13-5. - High Quality Standards.

I have concerns about the ambiguity in Standard 6.16. I support Standard 5.6.25 in the current version of WV Board of Education Policy 2320 which states "The county school system effectively participates with its assigned Regional Education Service Agency." This statement seems to be more appropriate than the recommended change. The proposed language in Standard 6.16 is very confusing and does not clarify responsibilities. It appears to shift responsibility to the school district for assessment of RESA services. This assessment occurs presently through the annual survey administered by RESA. I recommend maintaining the emphasis of utilization of RESA services rather than assessment which is already a component of the present policy.

Musselman Middle School

W. L. Aikens
Principal

8784 Winchester Avenue
Bunker Hill, WV 25413
(304) 229-1965

FAX TRANSMITTAL
(304) 229-1967

TO: Dr. Donna Davis 558-2405
FROM: Mary Burkhardt 229-1967
DATE: 1/12/01
NUMBER OF PAGES(including cover sheet) 1 + 7

COMMENTS

I phoned Charleston yesterday 558-2681
approx 4:30 p.m. and
said I could not get comments
until days I was told that they
would be accepted today.
Many thanks for extending the
deadline.

Musselman Means

I phoned yesterday @ 4 p.m. and was told
my comments would be accepted today.
POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions Thank you.

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Mary Burkhardt, Counselor
Position: Faculty Senate President Policy Review Committee
Name of County, School, Business, etc: Musselman Mdl Sch
Street Address: 8784 Winchester Av
City/State/Zip: Bunker Hill, WV 25413

COMMENTS/SUGGESTIONS

§126-13-1. - General.

in case to start - also considered that

Policy 2320

Comments/Suggestion Form

Page 2

§126-13-3. - Responsibility. 3, 4 Which "early detection and intervention programs" will the State Board "make additional... monetary & staffing resources" to us?? Berkeley County has two attendance workers - by any standard, is this number satisfactory?

✓ §126-13-4. - Annual Performance Measures.

Definitively, which "new student achievement standards" are anticipated for 2003-2004? EXPLAIN "value-added approach." The current Stanford test contract will expire before then. If test instrument is changed, how will standards be affected?? 4.2 To improve attendance rate, what statewide judicial support for truancies (and attendance worker staffing) can we expect from our leadership @ the State level?

✓ §126-13-5. - High Quality Standards.

4.4 Writing assessment standard of 2.5 is unrealistic. A more relevant measure of success in communication needs to be based on verbal performance - most students will not be "writing their way" through life.

4.5 What factors are considered in dropout/graduation rate? Social-economic considerations? Employment availability? Family history? 4.6 Why has the standard of split-grade classrooms stayed same since 1983?

4.11 Rather than assess "parent involvement" percent, a fairer question is what has the school done to encourage this.

126-13-5 H.G. standards (PAGE 2-A)

5.1.7 If "classroom instructional time" is protected from interruption, how would several middle school children participate in Social Studies/Science Fairs, Math Field Day, any field trip, Student Council, yearbook/school paper, Peer Mediations, reward trips for the PROS program, etc.?

5.1.9 Faculty need to teach what they know. The geometry teacher should not be expected to know the fine points of written communication any more than the English teacher should be expected to demonstrate weight lifting techniques. Writing instruction needs to be consistent and provided by the "expert" certified to teach it.

- 5.2.1 Explain "casual deficit."
- 5.6.4 Specify: which health services are provided?
- 5.6.13 Lunch is "not less than 30 minutes" (it is NOT the length of the usual period)
- 5.7.1 How many hours of orientation for new board?
- 5.9.1 Why remove old statement about evaluations?

126-13-5 (cont'd)

Page 2-B

- 5.9.5 why was this removed (staff level, for administrators)
- 5.11 add to end "and of staff."
- 5.11.1 add: "and consistently enforced."
- 5.11.5 policy for disciplinary procedures, etc. needs to be the same throughout county
- 5.12.4 add - "collaborates w/... ~~and~~ school staff and ..."
change "mobilizes" to "accesses"

§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

76.1 - School Improvement Plan to be established 9/1 : I don't think
 76.2 - 2nd assessments (writing) are returned by then (from previous year)

§126-13-8. - School Accreditation Status.

7.2 "substantially" is not a quantifying standard
 8.3 ~~date certain~~ (parameters of setting that date)?

§126-13-9. - Exemplary Accreditation Status.

9.2 Attendance rate standards should be different for elem vs secondary schls
 9.1 Need different standards for elem vs secondary students - easier for younger students to achieve than secondary students

§126-13-10. - Seriously Impaired Status.



WILTS SALMONS
SUPERINTENDENT

WAYNE COUNTY BOARD OF EDUCATION

POST OFFICE BOX 70 JAN 1 2
WAYNE, WEST VIRGINIA 25570-0070

TELEPHONE: (304) 272-5116
FAX: (304) 272-6500

The following comments on Policy 2320 were made by the Wayne County Schools central office curriculum team:

126-13. On-Site Reviews

13.3

✓ The added wording will help to ensure consistent audits and provide OEPA more credibility among LEA's. We strongly suggest this wording remain and funding be provided.

As a side suggestion, counties should be provided with specific details when citations are given at the school level by the audit team. They should provide the name of the teacher and the standard found to be in non-compliance. It is difficult to address a NC with just "a student was found sleeping in class at a certain school." Any questions the audit team may have should be discussed/checked with the building level administrator before leaving the site. Many times the problem could be addressed at that time.

126-13-4. Annual Performance Measures

4.1.

✓ The term "value-added performance measures" needs to be defined in more detail.

4.4.

The effective date should be no sooner than 2003-2004.

4.5.

Increases in graduation rate should be gradual and phased in rather than going from 90% to 95%.

4.6.

The following wording should remain: "provided that exemption requests to obtain these maximum ratios are waived in schools where the schoolwide pupil teacher ratio does not exceed 25 to 1 in grades 1 through 6.

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We agree that the percentage of students in grades 9-12 enrolled in advanced placement and/or honors classes should be at or above 5% but would like to expand the standard to include post secondary classes that are also taken in these grades.

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5.10.6

Lesson plans should be reviewed and commented on a minimum of once each semester NOT changed to once each quarter. Schools with large or less experienced staff members would get nothing done but observations, evaluations and checking lesson plans.

126-13-6. Indicators of Efficiency

We feel this entire section ~~needs~~ more explanation and clarification.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

1/5/01

As a teacher and parent of a part fourth grade student, I strongly feel that this test needs to be reassessed on how it is administered, it is too much pressure on a ten year old child. The test needs to be broken up into sections over 2-3 days. Many students who are proficient writers do poorly on this test due to how it is administered. Test is NOT age appropriate!

§126-13-5. - High Quality Standards.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Elisa J. Weber

Position: Teacher

Name of County, School, Business, etc: Marlinton Elementary School

Street Address: 926A Fifth Avenue

City/State/Zip: Marlinton, WV 24954

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

As a Standards Member, I recommend the following:

- ① mandatory writing workshop by 2001-2002 school year
 - ② 2001-2002 50% at 2 or above.
 - ③ 2002-2003 75% at 2 or above.
 - ④ 2003-2004 50% at 2.5 or above.
- } or show an increase in 2 of the most recent 3 years

No more than 15% below a 2.

Phase in the above requirements (#2-#4)

Elisa J. Weber

§126-13-5. - High Quality Standards.



Fairview Middle School
17 Jesse Run
Fairview, WV 26570

Principal: Samuel M. Snyder
Secretary: Tuesday Menas

Phone: 449-1312

December 4, 2000

DEC 12 2000

Dear Dr. Donna Davis :

We are very concerned about standard 4.4, regarding the writing assessment, in the revised SBP 2320 that is being considered by the West Virginia Department of Education.

First, we are concerned about the subjective manner which the writing assessment is evaluated. Even if the same people evaluate the essays every year utilizing the analytics scale identified, there can still be differences and discrepancies in the scoring.

Second, this is such a small sampling of the student's writing ability, done in a short period of time, that it is not a true measure of a student's ability.

Third, is the fact that the results do not provide a detailed enough critique of the students work. Two or three comments are not sufficient in determining why the student scored as they did. The essay should be returned with corrections made and critiques given so the student's current language arts teacher could provide reteaching for each individual student. These detailed critiques should follow the student, language arts teacher to language arts teacher, at each grade level until the next assessment is given.

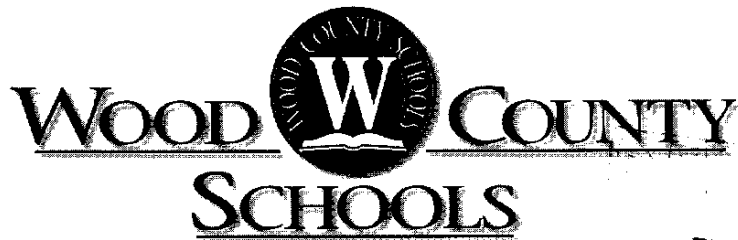
Because of the subjective nature, the value placed upon a small sampling of the student's writing ability, and since detailed critiques are not provided, it would be a mistake to use the results of the writing assessment as a performance standard. The assessment should be used as a diagnostic tool as they are currently being used.

Sincerely,

Samuel M. Snyder, Principal
Fairview Middle

Ellen Henderson, Language Arts Instructor
Fairview Middle

this



DEC 12

December 11, 2000

Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagan Street, Suite 204
Charleston, WV 25301

Dear Dr. Davis,

I looked at the WVDE web site and have some thoughts on the proposed changes to Policy 2320 that I would like to share with you.

The first is in reference to **section 5.6.14** - I am unsure of the meaning of this last sentence -

"Education Performance Audit teams will verify that all students are eligible for testing under non-standard conditions if the non-standard percentage of students exceeds 10 percent."

if the non-standard percentage of students exceeds 10 percent of what? Could this sentence mean this: *If the percent of special education students tested under non-standard conditions exceeds 10 percent, then the Education Performance Audit teams will verify the eligibility of all students tested under non-standard conditions.*

I am also wondering if the dates to submit the USIP and UCIP mentioned in proposed **sections 7.1 and 7.2**, would necessitate a change in the statewide assessment program to a fall testing schedule. If as in proposed **section 5.6.6** decisions are to be based on "current student data", it seems unlikely that the current spring testing schedule would allow anything but year-old student data to be used. For example, a June 15, 2001 USIP deadline would mean decisions would be based by necessity on spring 2000 test results and not on the most current test results of spring 2001. The June 15 deadline is too early for spring test results to be carefully analyzed and any "data-based decisions" made.

Hope these comments have been helpful.

Sincerely,

Dianne Boggess, Coordinator
Student Services & Assessment

c: Jan Barth

WHITE HALL ELEMENTARY

Route 7, Box 65
Fairmont, WV 26554
(304) 367 - 2158

DEC 12

December 6, 2000

Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagan Street, Suite 204
Charleston, WV 25301

Dear Dr. Davis,

this

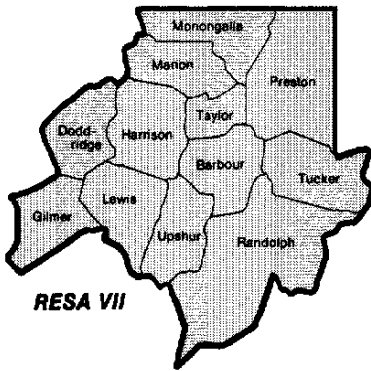
I am writing to comment on the County and School Improvement Plan Process: sections 7.1 and 7.2. I believe the current timelines of December 31 for the UCIP and September 30 for the USIP should remain as they are at the present time. We do not receive our SAT 9 scores before the middle of May. Our school calendar ends during the first week of June. With the requirements for closing school, planned vacations for LSI C members, and teacher training activities, I believe this will be a very difficult time to successfully complete the USIP. It is going to be very difficult to meet the timelines and involve everyone in the process. School administrators will be forced to do the major writing and organization of the USIP if the proposed timelines are implemented.

Thank you for your consideration of this matter.

Sincerely,

Roger N. Pratt

Roger N. Pratt, Principal
White Hall Elementary School



NORTH CENTRAL REGIONAL EDUCATION SERVICE AGENCY

1000 VIRGINIA AVENUE, FAIRMONT, WEST VIRGINIA 26554-3690

Telephone 304-367-1431

Within RESA VII 1-800-427-3600

FAX 304-366-4897

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JAN 12

*Serving Twelve West Virginia Counties:
Barbour, Doddridge, Gilmer, Harrison, Lewis, Marion,
Monongalia, Preston, Randolph, Taylor, Tucker, and Upshur.*

RONALD E. DELLINGER
Executive Director

January 9, 2001

Dr. Donna Davis
Deputy Director
Office of Education Performance Audits
550 Eagan Street Suite 204
Charleston WV 25301

Dear Dr. Davis:

The RESA Executive Directors met on Tuesday, January 9, 2001, to address a variety of issues. A considerable amount of time was devoted to discussion of proposed changes in West Virginia Board of Education Policy 2320.

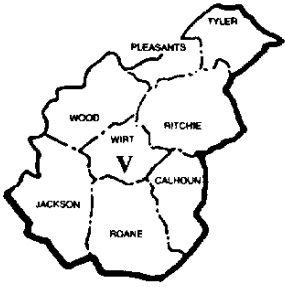
It is the unanimous opinion of the eight RESA Executive Directors that the proposed language in standard 6.1.6 is very confusing and ambiguous. Standard 5.6.25 in the current version of West Virginia Board of Education Policy 2320 which states... "The county school system effectively participates with its assigned Regional Education Service Agency."...appears to be more appropriate. Consequently, I recommend that the language previously contained in standard 5.6.25 be substituted for the proposed language in standard 6.1.6.

Thank you for your attention in this matter. If you should have questions concerning this comment, please feel free to get in touch with me.

Sincerely yours,

Ronald E. Dellinger
Executive Director

RED/jb



REGIONAL EDUCATION SERVICE AGENCY V
2507 NINTH AVENUE
PARKERSBURG, WV 26101
PHONE (304) 485-6513 FAX (304) 485-6515

JAN 12

January 10, 2001

Dr. Donna Davis
Deputy Director
Office of Education Performance Audits
550 Eagan Street, Suite 204
Charleston, WV 25301

Dear Dr. Davis:

It is my opinion that the proposed standard 6.1.6 of WV Board of Education Policy 2320 is confusing and ambiguous as written. Therefore, I recommend that the standard state, "The county school system effectively participates with its assigned Regional Education Service Agency."

Sincerely,

A handwritten signature in cursive script that reads "Ronald K. Nichols".

Ronald K. Nichols
Executive Director

dc

Donna Davis

From: Susan Jones [ssejones@access.k12.wv.us]
Sent: Friday, January 12, 2001 10:02 AM
To: dncavis@access.k12.wv.us
Subject: 2320

Donna, I realize that this comment is a "a day late and a dollar short" but I was just talking to Kenna this morning and he suggested that I send it (even though the deadline was yesterday.) I had called him with some questions about 4.12 and 4.13 as they stand now. We both expressed concern about the standards as they stand . . . especially the reading AND math AND language parts. The total basic skills criteria seems much more reasonable to me. It is also in keeping with the standard to which we as schools are held for overall performance. I would also like to see and "increasing trend" provision included. Other concerns: It is not stated that these graduates are those tested under standard conditions. Perhaps that should be included so that we do not look at total graduates as the divisor.
As I said before, I realize that the comment period is over . . . but decided to send along my thoughts on these two standards. Susan Jones, Marshall County

this part

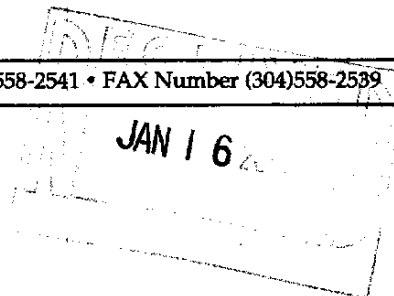


School Building Authority of West Virginia

Clacy E. Williams, Executive Director

2300 Kanawha Boulevard, East • Charleston, West Virginia 25311-2306 • Office Number (304)558-2541 • FAX Number (304)558-2539

January 11, 2001



Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Egan Street, Suite 204
Charleston, WV 25301

Dear Dr. Davis:

Below is a change in Policy 2320 that I perceive is essential in assuring the delineation of responsibilities among and between agencies. Additionally, it will preclude future contention over significance of "deficiency lists" verses the priorities identified by the Authority as the greatest "needs" essential for funding. I would request that this language be added to the proposed policy changes prior to its adoption.

"5.5.1 Facilities and equipment specified in Policy 6200, Chapters 1 through 14 are available in all schools, classrooms and other required areas. A determination will be made by using the Process for Improving Education (WV Code 18-2E-5) whether any identified deficiencies adversely impact and impair the delivery of a high quality educational program. Note: Corrective measures to be taken in response to any identified resource deficiency will of necessity be subject to the feasibility of modifying existing facilities, availability of funding, and prioritization of educational needs." This policy is in no wise to be interpreted to preclude, direct or refute the authority, judgement or priorities of the School Building Authority who is statutorily responsible for prioritizing "Need" for the purpose of funding school improvements or school construction in the State of West Virginia. (Policy 6200 and Tomblin v. Gainer)"

Respectfully submitted,

A handwritten signature in cursive script, appearing to read 'Clacy Williams'.

Dr. Clacy Williams
Executive Director
School Building Authority of West Virginia

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Robert P. Mason

Position: Assistant Superintendent

Name of County, School, Business, etc: Mineral County Schools

Street Address: One Baker Place

City/State/Zip: Keyser, WV 26726

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

Policy 2320

Comments/Suggestion Form

Page 2

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

- 4.2 This is very difficult for a high school
- 4.6 This has never been made clear - "Exemptions may be granted..." - by whom?
- 4.4 Some sort of pilot study should be done to verify these cut-off points are appropriate.

§126-13-5. - High Quality Standards.

- 5.11.6 - This standard reads as though it applies only to the 2000-01 school year.
- 5.12; 5.12.1-5.12.5
These standards/statements are all vague and as stated are simply up to the judgement of whoever is assessing them.

(attached)

5.6.7 -

clarify! --- what does "business vocational needs" and "vocational college offerings" mean?

5.2.2 - reword -- instead of "based on," replace with "supports." The entire budget, e.g., transportation, etc., is not based solely on the Unified Improvement Plans.

5.6.13 -

Grievance decisions have supported a minimum of a 60-minute planning period instead of "the length of the usual class period" for schools in 90-minute block schedules.

Policy 2320

Comments/Suggestion Form

Page 3

§126-13-6. - Indicators of Efficiency.**§126-13-7. - County and School Improvement Plan Process.**

7.1, 7.2 --- Both plans should be due to the State Nov. 1 Each County should be able to decide which comes first - the county plan or the school plan. Also the end of the year is a very bad time to be developing an improvement plan!

§126-13-8. - School Accreditation Status.

Policy 2320

Comments/Suggestion Form

Page 4

§126-13-9. - Exemplary Accreditation Status.

§126-13-10. - Seriously Impaired Status.

§126-13-11. - School System Approval.

Policy 2320

Comments/Suggestion Form

Page 5

§126-13-12. - Nonapproval Status.

§126-13-13. - On-Site Reviews.

§126-13-14. - Capacity Building.



**MINERAL COUNTY SCHOOLS
ONE BAKER PLACE
KEYSER, WV 26726**



PHONE: 304-788-4200

FAX: 304-788-4204

TO:

Donna Davis

FROM:

Pat Mason

DATE:

January 16, 2001

PAGES:

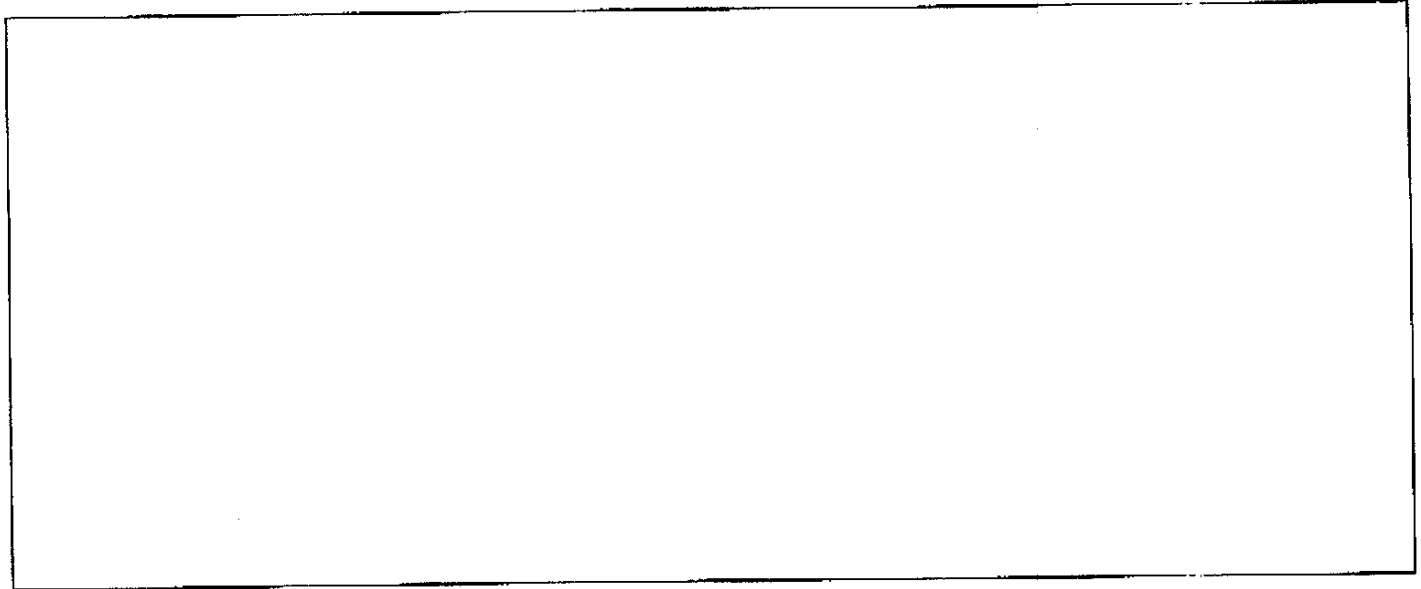
7

(INCLUDING THIS COVER)

FAX #:

RE:

Policy 2320 Comments



ORIGINAL DOCUMENT WILL: **BE SENT REGULAR MAIL**

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IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL BACK AS SOON AS POSSIBLE.

January 12, 2001

Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagen Street Suite 204
Charleston, WV 35302

Dr. Davis,

Policy 2320 revisions have many of us at Grandview Elementary concerned. Due to consolidation, the dynamics of our school population has changed dramatically. Our free and reduced lunch count went from 61% to 72% this year. School population increased 11% with no additional services or finances. Children with varied needs are now in our classroom without services or resources. It is difficult to be held accountable in light of these present conditions.

Teachers and principals are overwhelmed with paperwork for accreditation. Little time is left to talk with parents and plan improvements. Teachers' planning time has been eroded by additional requirements to document the following: test scores, skilled deficiencies for each student, how they monitor student progress, what they teach, how, when, and with whom they teach it, to whom they teach it, how and when they assess learning, when and what they reteach, when they communicate with parents, how and when School Assistance Team interventions are implemented, how and when behavior plan interventions are implemented, and how teachers correlate what they teach and reteach with WVIGOs and SAT 9 skills. In reviewing proposed changes we would like for you to consider the following comments:

- 4.1- School test score improvement should be self-evaluated rather than a blanket standard. Student achievement measures should show progress of child compared to self not others, so that socioeconomic status does not play a factor in the accreditation process.
- 4.2- Unrealistic expectations of attendance without parental consequences in Elementary School settings. Secondary attendance policies could be achieved because a student is held accountable.
- 4.4- Normed tests are needed before raising standards. Keep score at 2.0 rather than 2.5.
- 5.11.6- Some schools do not have adequate facilities to practice and measure physical fitness requirements, such as the mile run.

- 76.2 -New due date for Unified School Improvement Plan is inadequate due to time constrictions in order to analyze test scores and revise a plan. Not all schools are year round. We need additional days to plan improvement activities.

Please consider our comments.

Thank you,

Grandview Staff

Lisa Brown
[Signature]
Drema Scott

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

JAN 16 2001

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Frank J. Caputo

Position: Teacher

Name of County, School, Business, etc: Marion County - Monongah Middle School

Street Address: 550 Camden Ave

City/State/Zip: Monongah, WV 26554-1105

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

126-13-4 Annual Performance Measures: This adjustment of test scores for economic status of school is long overdue. Thanks for seeing the necessity.

4.1 page 5 Asking a school to perform above the fiftieth percentile in total basic schools is unrealistic and sets the school and state up for failure in the eyes of the public. Also the economic status of the school would preclude scores in the first quartile being higher than 15%. Therefore, we oppose the implementation of this change.

4.4 Setting a standard that is above average as the average--2.5 on the Writing Assessment test—is again extremely unrealistic and again sets the school and school system up for public ridicule. The current scores, particularly on the seventh-grade level, are no where near the proposed scores.

4.13. To change the requirements for graduation to the sixtieth percentile would encourage a higher dropout rate in the high school. Again why should we always expect West Virginia students to perform above average?

§126-13-5. - High Quality Standards.

5.2 The Unified County Improvement Plan and the Unified School Improvement Plan have to be completed so early that a distribution of resources based solely on the budget included in them would handicap the county and school, since it is impossible to project exactly what needs will need met during the whole school year. Thus, a reliance on these plans, usually completed in June, would seem an unwise thing to do.

§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

§126-13-8. - School Accreditation Status.

Since American public schools have ideally tried to educate all the children of all the people in an equal and unbiased way, it would certainly seem a step backwards to start labeling schools as exemplary or average, making it appear as though students were getting an inferior education in some public schools, when, in reality, the status was achieved through the high economic status of the attendance area. Such an approach would surely lead to the voucher system, crippling the American education system.

§126-13-9. - Exemplary Accreditation Status.

Since American public schools have ideally tried to educate all the children of all the people in an equal and unbiased way, it would certainly seem a step backwards to start labeling schools as exemplary or average, making it appear as though students were getting an inferior education in some public schools, when, in reality, the status was achieved through the high economic status of the attendance area. Such an approach would surely lead to the voucher system, crippling the American education system.

§126-13-10. - Seriously Impaired Status.

§126-13-11. - School System Approval.

§126-13-12. - Nonapproval Status.

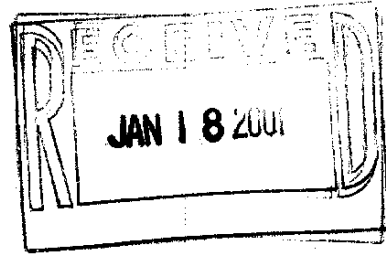
§126-13-13. - On-Site Reviews.

1344.3 Education performance audit teams should be made up, as they currently are, of active, working out-of-county personnel who are employed temporarily on an as-needed basis. These teams give greater insight into a county's problems because they daily try to do these same jobs themselves. They are not hired bureaucrats, who make it their duty to locate problems in order to keep their full-time job. Such teams would not come with the knowledge and empathy needed to evaluate fairly.

We also need to realize this will cost more money. With low tax revenues so low does this really make good economic sense, when ~~our~~ teacher salaries have slipped to 41st from 30th only a few years ago!

§126-13-14. - Capacity Building.

January 12, 2001



Dr. Donna Davis, Deputy Director
Office of Education Performance Audits
550 Eagen Street Suite 204
Charleston, WV 35302

Dr. Davis,

Policy 2320 revisions have many of us at Grandview Elementary concerned. Due to consolidation, the dynamics of our school population has changed dramatically. Our free and reduced lunch count went from 61% to 72% this year. School population increased 11% with no additional services or finances. Children with varied needs are now in our classroom without services or resources. It is difficult to be held accountable in light of these present conditions.

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Please consider our comments.

Thank you,

Grandview Staff

Lisa Brown

William Poston

Drema Scott

JAN 1 2

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Wilma Dale

Position: Principal

Name of County, School, Business, etc: Marlinton Elementary School

Street Address: 926A Fifth Avenue

City/State/Zip: Marlinton, WV 24954

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

I have a concern about the change in the original draft copy of the annual performance measure 4.4 of having 50% of students score at 2.5 or above on the Writing Assessment. State-wide only 33% of the 4th. grade students met this goal on the 2000 test. Only 17% of our 4th. grade met this standard.

I agree that we need to improve our results; however, I feel that this standard state-wide is too demanding.

We felt that we could work within the original draft of 4.4 (75% at 2.0 or above). This was much more realistic as a state-wide goal.

Also, I'm concerned that the change in this draft policy was not better publicized along with the January 11 deadline. We were working under the assumption to meet the requirements in the first draft. I did not see nor hear of this change until last week by word of mouth. I went into the website and found this. Better communication would be appreciated.

§126-13-5. - High Quality Standards.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

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§126-13-5. - High Quality Standards.

JAN - 8

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: MR. MANNY P. ARVON / BERKELEY COUNTY SCHOOLS

Position: SUPERINTENDENT

Name of County, School, Business, etc: BERKELEY COUNTY

Street Address: 401 SOUTH QUEEN ST.

City/State/Zip: MARTINSBURG, WV 25401

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures. 4.3 and 4.5

To decrease the dropout rate from 6% to 5% and a graduation rate of 95% would be unrealistic and an extremely difficult standard for Berkeley County Schools to meet. The dropout rate is a regional concern for school districts in the Eastern Panhandle and neighboring counties in Maryland and Virginia. The low unemployment rate creates numerous job opportunities for high school age students. Students make decisions to join the work force rather than complete their education.

§126-13-5. - High Quality Standards.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures. 4.3 and 4.5

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§126-13-5. - High Quality Standards.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

JAN - 8

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Mannington Middle School Faculty Senate

Position: English / Reading teachers

Name of County, School, Business, etc: Mannington Middle School

Street Address: 113 Clarksburg Street

City/State/Zip: Mannington, WV 26582

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

see back →
and attachments

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

*See attached
Comments*

§126-13-5. - High Quality Standards.

4.4

If one assumes that 2.0 is average for our students on the writing assessment and the standards are now to be raised to 2.5 for 50% of all students, I feel it is unreasonable and too high. While ^{highly} high expectation ~~is~~ is a good practice, I feel this is unfair to our students, who are from a rural, low economic or low income part of the county to be expected to perform at an above average level.

The scoring on the Writing Assessment is very subjective. Many of our brightest students receive scores of two. It appears as if this is a blanket score handed out to the masses. If so, it would make sense for most students to receive this score since it indicates an average ability. Most students are average. On the other hand, in order for a student to score a 2.5 one teacher would have to evaluate a student's paper as a 2 and a second teacher would have to evaluate the paper as a 3. A score of three would indicate an above average rating. Such a large discrepancy in scoring would not occur frequently between two teachers scoring papers. Most groups are going to fall within a normal bell shaped curve. It is fine to set goals and strive to improve ourselves, but what is wrong with being average?

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Mr. Frank Aliveto, Berkeley County Schools

Position: Deputy/Assistant Superintendent

Name of County, School, Business, etc: Berkeley County

Street Address: 401 South Queen Street

City/State/Zip: Martinsburg, WV 25401

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

4.3 and 4.5

Because of regional concerns and conditions, the 5% dropout rate and 95% graduation rate will be extremely difficult standards for Berkeley County Schools to obtain. Low unemployment and high mobility rates are just two factors that continue to deter our students from completing their public education.

§126-13-5. - High Quality Standards.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

4.3 and 4.5

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§126-13-5. - High Quality Standards.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

JAN - 8

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Robert R. Laxton

Position: Principal

Name of County, School, Business, etc: Kanawha Co. Elkview Middle School

Street Address: 5090 N Elk River Road

City/State/Zip: Elkview, WV 25071

COMMENTS/SUGGESTIONS

§126-13-1. - General.

✓ The Value Added Approach seems to be a good method - details are too "skippy" to evaluate however.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

Value Approach Method needs much more definition.

4.4 The Writing Assessment should be included in the document. The standard is totally beyond reason

4.2 The attendance rate of 93% — please be aware the school follows procedures and the law. Students and parents in Kan Co. are not held accountable legally.

§126-13-5. - High Quality Standards.

§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

✓ The deadline of June 15 for USIP is not realistic. The test results, Effective Schools Survey etc. data is not available in time for the LSIC and faculty/senators to analyze.

§126-13-8. - School Accreditation Status.

§126-13-9. - Exemplary Accreditation Status.

*Please check the socio-economic level of these schools.
Is this for political purposes?*

§126-13-10. - Seriously Impaired Status.

§126-13-11. - School System Approval.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

JAN - 8

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Sandra Morris, Principal- Shoals Elementary

Position: Principal

Name of County, School, Business, etc: Kanawha County-- Shoals Elementary

Street Address: 100 Dutch Road

City/State/Zip: Charleston, WV 25302

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

✓ 4.4 A minimum of 50% of the school's students score at or above 2.5 on the Writing Assessment is too high. It should be 50% of the students scores at or above 2.0.

4.2 State should provide incentives for student attendance to improve if expectations are going to be 93%.

§126-13-5. - High Quality Standards.

✓ 5.6 Students unable to participate in the norm-reference tests that have an IEP or 504 Plan should not have to participate in the WV Alternate Assessment. The three day training for alternative assessment for school personnel is lost classroom time .

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

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§126-13-5. - High Quality Standards.

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§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

*7.1 and 7.2 Dates for turning in USIP should be kept as they
are.*

§126-13-8. - School Accreditation Status.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

JAN - 8

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Paul A. Tyson II

Position: Principal

Name of County, School, Business, etc: Hedgesville Elementary

Street Address: 88 School House Drive

City/State/Zip: Hedgesville, WV 25427

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

- 4.11 I would like to see a specific method of determining the percentage of parent involvement. What constitutes parent involvement at one school may not be utilized at another.

§126-13-5. - High Quality Standards.

- ↓ 5.6.11 A faculty senate comprised of all permanent, full-time **instructional personnel** employed at the school is established and functioning at each school and meets the statutory requirements.
- ↓ 5.9.4 Principals' academy. All principals meet the requirements for training through the principals' academy. Principals attending outside their contract period will be reimbursed their daily rate plus expenses.

§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

§126-13-8. - School Accreditation Status.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

JAN - 8

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Terry W. Farley / Coal City Elementary School

Position: Principal

Name of County, School, Business, etc: Coal City Elementary School (Raleigh Co.)

Street Address: P.O. Box 1240 900 Independence Rd.

City/State/Zip: Coal City, W.V 25823

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

- ✓ 4.1 Value-added achievement standard needs to be objective and not subjective in analysis.
- 4.2. Attendance rate of 93% is too high. I do like the thought of not counting students absent when the bus does not run.
- ✓ 4.4. The criteria for this item is way to high. It would also be a better assessment if grades 6, 8 and 11 would be used. Holistic Scoring Workshop should be state funded for all teachers.
- ✓ 4.14 The Presidential Physical Fitness Test was moved to 5.11.6. This was one indicator we could consistently meet. We realize the need for both 4.4 and 4.14 to be in another rated area.

§126-13-5. - High Quality Standards.

§126-13-6. - Indicators of Efficiency.

§126-13-7. - County and School Improvement Plan Process.

§126-13-8. - School Accreditation Status.

§126-13-9. - Exemplary Accreditation Status.

✓ 9.4 The standard for the writing assessment is too elevated.

§126-13-10. - Seriously Impaired Status.

§126-13-11. - School System Approval.

§126-13-12. - Nonapproval Status.

§126-13-13. - On-Site Reviews.

§126-13-14. - Capacity Building.

DEC 11 1999
JAN - 5

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Cindy Daniel

Position: Asst Superintendent - Kanawha County Schools

Name of County, School, Business, etc: _____

Street Address: 200 Elizabeth St.

City/State/Zip: Chas W 25314

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

✓ 4.4 - Writing Assessment Standard is too high. A 2.0 is more reasonable. A 2.0 is an average score. Were English/LA teachers on the committee that recommended this standard?

§126-13-5. - High Quality Standards.

- ✓ 5.1.9. The term "every appropriate class" is too vague. Needs to be defined.
- ✓ 5.6.2. The technology plan should not be a separate plan. Should be part of the LISIP. Current plan is too cumbersome for schools.

§126-13-9. - Exemplary Accreditation Status.

- These standards are not reasonable for secondary schools.
Attendance and drop out rate. Standards are too high.

§126-13-10. - Seriously Impaired Status.

§126-13-11. - School System Approval.

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

DEPT
JAN - 5

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Jane Roberts

Position: Principal

Name of County, School, Business, etc: Alban Elem. Kanawha

Street Address: 2030 Harrison Ave

City/State/Zip: St Albans, WV 25177

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

4.4 - Could support 50% of students scoring
/ at or above 2.0 instead of 2.5 on
writing assessment.

§126-13-5. - High Quality Standards.

5.6.14 - Alternate Assessment is not
necessary given the state's uniform
IEP and ^{documenting} progress on individual
students' goals that is required.

§126-13-6. - Indicators of Efficiency.

This is too vague -

*Individual school systems should
✓ not be responsible for utilizing
RESA services when what
RESA offers is of little value.*

§126-13-7. - County and School Improvement Plan Process.

§126-13-8. - School Accreditation Status.

§126-13-12. - Nonapproval Status.

§126-13-13. - On-Site Reviews.

§126-13-14. - Capacity Building.

JAN - 3 2000

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Delores Ranson

Position: Assistant Superintendent

Name of County, School, Business, etc: Jackson County Schools

Street Address: P. O. Box 770

City/State/Zip: Ripley, WV 25271

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13.3. - Responsibility.

§126-13-4. - Annual Performance Measures.

✓ 4.2: ... "adjust for students excluded as a result of the ...and school bus transportation interruptions." *This would be very difficult if not impossible to monitor.*

4.8: *This Annual Performance Measure should be moved into the area of High Quality Standards: Personnel 5.8.*

Also, I can not find in school law that the assignment of the principal is based on the previous year's 2nd month enrollment report. I would believe that to meet West Virginia Code §18A-2-9, principal assignments would have to be for the current year.

§126-13-5. - High Quality Standards

✓ 5.1.2: *I find this standard to be written awkwardly. Are instructional goals and objectives and the mission of the school provided to the teacher and the public upon request? All teachers should have copies of the instructional goals and objectives and of the school mission....not only if they request them.*

✓ 5.1.9: *Will the "appropriate" classes be defined in the verification statement? If not, who will define?*

✓ 5.8.1 *This standard does not include providing personnel to meet the pupil teacher ratio requirement of WV §18-5-81a. The only measurable requirement of the policies referenced here is found in Policy 2510: 7.43 (B), which states that kindergarten teachers have one aide if the class enrollment exceeds ten (10) students. Adequate would need to be defined to determine compliance with this standard. Is there adequate instructional personnel when English and or science classes, for example, have more than 30 students in grades 7-12? Is there adequate personnel in a first grade classroom when several of the twenty-five students have behavior or learning problems and there is one teacher and no aide as aide is not required for classes other than kindergarten?*

§126-13-6. Indicators of Efficiency.

§126-13-7. County and School Improvement Plan Process.

§126-13-8. - School Accreditation Status

126-13-9. *Exemplary Accreditation Status is almost impossible to meet.*

DEC 18

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: James E. Frazier

Position: Principal - Cottageville Elementary School

Name of County, School, Business, etc: Jackson Co. Cottageville Elementary School

Street Address: 100 School Street

City/State/Zip: Cottageville, West Virginia 25239

COMMENTS/SUGGESTIONS

§126-13-1. - General.

§126-13-2. - Purpose.

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures (4.1) I feel the standards we now have are very realistic and are fine. They do not need changed.

(4.4) Standards are set too high.

Should read a minimum of 50% score at or above 2.0.

No more than 15% score at or below 1.0.

(4.10 & 4.11 & 4.12)

Both need a uniform way to figure 70's.

I served on one On-Site team where I asked the principal how he got 100% parent involvement. He told me if he called any parents he counted that as parent involvement! See what I mean!

§126-13-5. - High Quality Standards.

5.6.23 & 5.10.2 We have three plans to do each year. Let's combine all these plans into 1 plan. My staff feels like every time we meet we are developing another plan. HELL P!! One teacher said to me our last Faculty Senate meeting, "We are being planned to death!"

5.11.3 Should be stated that each school shall have a preventive discipline program in place. Leave out may, include A.S.P. and peer mediation. Some schools feel they MUST HAVE these two programs or be in non-compliance

**POLICY 2320: A Process for Improving Education -
Performance Based Accreditation System
Comments/Suggestions**

DEC 18

Directions: Please use this form in commenting on the proposed Policy 2320, A Process for Improving Education - Performance Based Accreditation System. Additional sheets may be attached if needed.

Individual/Organization: Gayle Mills / Cranberry-Prosperity Elementary

Position: Classroom Teacher

Name of County, School, Business, etc: Raleigh County

Street Address: 4575 Robert C. Byrd Drive

City/State/Zip: Beckley, WV 25801

COMMENTS/SUGGESTIONS

§126-13-1. - General.



§126-13-2. - Purpose.

- ① "and capacity building to..." is awkwardly written
- ② "standards are, at a minimum, being met" -
define at a minimum

§126-13-3. - Responsibility.

§126-13-4. - Annual Performance Measures.

126-13-4 - "3. goals for schools in average scores"

This phrase is not clear and implies above average or below average scores are goal exempt.

§126-13-5. - High Quality Standards.

✓ 5.1.9 - Define every appropriate class what is taught by a teacher of writing can quickly be erased, negated, or discouraged by a teacher that has little background in writing instruction.

cont 126-13-5

~~§126-13-6. - Indicators of Efficiency.~~

5.6 - "planning period that is the length of the usual class period..."

✓ This needs revised based on the 90 minute block scheduling for some schools, it creates more inequity than equity.

§126-13-7. - County and School Improvement Plan Process.

§126-13-8. - School Accreditation Status.