

WEST VIRGINIA
SECRETARY OF STATE
KEN HECHLER
ADMINISTRATIVE LAW DIVISION

Form #5

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DEC 16 4 26 PM '96
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. Const., Article XII, §2; W.Va. Code §§18-2-5; 18-2-7a;
and 18-2E-5

RULE TYPE: PROCEDURAL _____ INTERPRETIVE X

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 X, NO _____

IF YES, SERIES NUMBER OF RULE BEING AMENDED: 13

TITLE OF RULE BEING AMENDED: Performance Based Accreditation System
(2320)

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

TITLE OF RULE BEING ADOPTED: _____

THE ABOVE RULE IS HEREBY ADOPTED AND FILED WITH THE SECRETARY OF STATE. THE
EFFECTIVE DATE OF THIS RULE IS July 1, 1997 (Unless specified otherwise
within the policy.)

Cynthia E. Evans
Cynthia E. Evans
Director, Legal Services

17.40

**EXECUTIVE SUMMARY
WEST VIRGINIA BOARD OF EDUCATION**

POLICY NUMBER AND TITLE: Policy 2320
Performance Based Accreditation System

PUBLIC COMMENT PERIOD ENDS: November 15, 1996 **ADOPTED:** December 12, 1996

BACKGROUND

Senate Bill 300, passed during the 1996 regular session of the West Virginia Legislature, amended and reenacted W.Va. Code §18-2E-5. The legislation requires the State Board, on or before November 1, 1996, to establish high quality standards. The legislation also requires the Board to establish a system that measures the quality of education and preparation of students based on measures of student and school performance.

Policy 2320, Performance Based Accreditation System, was adopted by the State Board in November 1989. The high quality education standards and measures of student and school performance applied to all 55 counties and all schools in West Virginia during the 1989-90 school year and each year thereafter. A system for county accreditation began in 1982.

PURPOSE

The purpose of this policy is to establish the high quality education standards and measures of student and school performance required by Senate Bill 300.

COMMENTS

The proposed policy has been revised based on suggestions gleaned from the hundreds of written comments, public hearings conducted November 12, 1996, and the Legislative Oversight Education Commission. All proposed revisions to the policy as placed on comment are indicated by underlines and strike-throughs.

The major proposed revisions:

- eliminate unnecessary duplication,
- align the policy with revisions proposed in other policies,
- eliminate the performance measure for the promotion rate,
- eliminate the performance measure on graduates receiving additional certification,
- move the High Quality Standard for the Presidents Physical Fitness Test to Section 4 - Annual Performance Measures and change the percentage required to pass the test from fifty percent to forty percent or shows an increasing trend, and
- add a high quality standard that requires participation in WVEIS.

IMPACT

The impact of this policy is that higher expectations for student and school performance will lead to improved academic performance.

WEST VIRGINIA BOARD OF EDUCATION POLICY

POLICY 2320

PERFORMANCE BASED ACCREDITATION SYSTEM

The West Virginia Board of Education has the primary responsibility for defining and assuring the delivery of a thorough and efficient system of education through the state superintendent of schools and the West Virginia Department of Education. There needs to be a system of accountability that ensures the elements of a thorough and efficient system of education are available to all students. Such a system provides all students equal access to substantive curricular offerings and appropriate related student support services. The foundation for the accountability system is based on research results, best practices, professional development, technical assistance, and disseminating information.

Given this responsibility, the State Board adopts an accountability system that establishes high quality standards pertaining to all education programs, education personnel development, and related services. The board also establishes measures of student and school performance to ensure the quality of education and preparation of students at each school. The primary emphasis of accountability is school and student performance.

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) _____

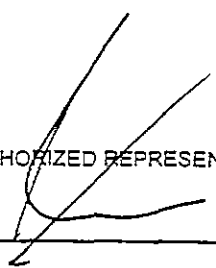
SHOW OVER-ALL EFFECT IN ITEMS 1 AND 2 & GIVE EXPLANATION OF BREAKDOWN BY FISCAL YEAR INCLUDING LONG-RANGE EFFECT

EFFECT OF PROPOSAL	ANNUAL		FISCAL YEAR		
	INCREASE	DECREASE	CURRENT	NEXT	THEREAFTER
1. ESTIMATED TOTAL COST	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
PERSONAL SERVICES CURRENT EXPENSES REPAIRS/ALTERATIONS EQUIPMENT OTHER	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
2. ESTIMATED TOTAL REVENUES	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0

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

DATE 9/4/96

AGENCY West Virginia Department of Education

AUTHORIZED REPRESENTATIVE 

TITLE 126
LEGISLATIVE RULE
BOARD OF EDUCATION

SERIES (13)

PERFORMANCE BASED ACCREDITATION SYSTEM (2320)

§126-13-1. General.

1.1. Scope. -- This rule establishes the high quality educational standards and annual performance measures that, when met by schools and county boards, will provide assurance that a thorough and efficient system of education is being provided for all West Virginia public school students on an equal educational opportunity basis.

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. -- December 16, 1996

1.4. Effective Date. -- July 1, 1997

1.4.1. Unless specified otherwise within the policy.

1.5. Repeal of former rule. Revises Policy 2320; last revised September 26, 1992.

§126-13-2. Purpose.

2.1. 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; and percent of graduates who attain the minimum level of performance in the basic skills recognized by the State Board and the grade level distribution in which the minimum level of performance was met.

§126-13-3. Responsibility.

3.1. 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:

- a. Goal 1. All children entering the first grade will be ready for the first grade;
- b. Goal 2. All students will have equal education opportunity;
- c. 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;
- d. Goal 4. Ninety percent of ninth graders will graduate from high school;
- e. 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; and
- f. Goal 6. All working age adults will be functionally literate.

3.2. The state board shall annually report to the governor and the legislature the progress toward achieving these goals.

§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. The remaining performance measures may be reviewed annually or randomly by on-site review teams.

4.1. 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)

4.2. The student attendance rate is at or above 90.5% for the 1997-1998 school year; 91.5% for the 1998-1999 school year; 92.5% for the 1999-2000 school year; and 93% for the 2000-2001 school year and subsequent years.

4.3. The maximum student dropout rate is six percent (6%) 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. By the year 2003, the graduation rate is at or above ninety percent (90%). The graduation rate, adjusted for migration, will be calculated according to the number of ninth graders who remain in school and graduate. (Education Goal 4)

4.5. 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 no more than 3 additional pupils per teacher for grades 4 through 6 (W.Va. Code §18-5-18a), 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.

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

4.7. 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)

4.8. 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.

4.9. The percentage of 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.

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

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

4.12. The percentage of graduates attaining the minimum level of performance (50th percentile) in reading, mathematics, and language is at or above sixty percent (60%).

4.13. The percentage of graduates attaining the warranty level for an advanced workplace position or entry into post-secondary education (70th percentile) in reading, mathematics, and language is at or above thirty-three percent (33%).

4.14. The percent of students in grades K-9 passing the Presidential Physical Fitness Test at the "national" level is forty percent (40%) or above for the 2000-2001 school year 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 in the following areas: curriculum; workplace process/workplace; 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; and safe and disciplined schools. Each county board of education, in order 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. The mission and goals of the school provide direction for planning the school's education program. (Policy 2510)

5.1.2. The curriculum is based, at a minimum, on the instructional goals and objectives approved by the West Virginia Board of Education. (Policy 2520)

5.1.3. Curriculum and instructional practices reflect high expectations for all students. (Policy 2510)

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

5.1.5. 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. A copy of the appropriate instructional goals and objectives is provided each teacher and to the public upon request. (Policy 2510)

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

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

5.1.9. Students are provided instruction in writing and are expected to write throughout all programs of study. (Policy 2510; Policy 2520)

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

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

5.1.12. 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. Students not achieving mastery of the instructional goals and objectives are provided reteaching. (Policy 2510)

5.1.14. Programs of study are provided in grades K-12 as listed in Policy 2510. (Policy 2510; Policy 2520)

5.1.15. Honors and advanced placement education programs are provided in grades 9-12. (W.Va. Code §18-2E-3a; Policy 2510)

5.1.16. 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. (effective 1998-1999) (Policy 2510)

5.1.17. 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. Students are provided guidance and advisement sufficient to allow them to choose a career major prior to completion of grade 10. (effective 1999-2000) (Policy 2510)

5.1.19. 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 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. 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)

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. The county board distributes the system's resources on the basis of the Unified County Improvement Plan. (effective July 1, 1998) (Policy 2510)

5.2.2. The school distributes resources on the basis of the Unified School Improvement Plan. (effective July 1, 1998) (Policy 2510)

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

5.2.4. Individual school accounting practices are consistent with state policies and procedures. (Policy 1224.1; Policy 8100)

5.2.5. The faculty senate monitors the funds allocated to individual classroom teachers and librarians from legislative appropriations. The remainder of the funds are 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. The county board provides safe transportation and special transportation services for eligible students. (Policy 2419; Policy 4334; Policy 4335)

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

5.4.3. 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)

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

5.5.1. Facilities provide an environment conducive to learning. (Policy 2510; Policy 6200)

5.5.2. Facilities are adequate to provide the minimum education program required in Policies 2510 and 2520. (Policy 2510; Policy 2520)

5.5.3. 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)

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

5.5.5. 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. 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. The county board meets at least once a year with local school improvement councils and considers recommendations and Unified School Improvement Plans from the local school improvement councils in decision making. (W.Va. Code §18-5-14)

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

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

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

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

5.6.7. The school and county report cards are disseminated so parents, teachers, administrators and the community are aware of the quality of public education. (W.Va. Code §18-2E-4; Policy 7300)

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

5.6.9. County and schools involve active business partners in education. (Policy 2510)

5.6.10. A county steering committee is established and functioning. (W.Va. Code §18-2E-8; Policy 2510)

5.6.11. 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)

5.6.12. 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)

5.6.13. A local school improvement council is established and functioning at each school. (W.Va. Code §18-5A-2)

5.6.14. A faculty senate comprised of all permanent, full-time professional educators employed at the school is established and functioning at each school. (W.Va. Code §18-5A-5)

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

5.6.16. Teachers are provided a duty-free planning period that is the length of the usual class period and is not less than thirty minutes. (W.Va. Code §18A-4-14)

5.6.17. Teachers and service personnel are provided a duty-free lunch period. (W.Va. Code §18A-4-14)

5.6.18. Test security measures are in place for mandated statewide testing. (Policy 2340)

5.6.19. 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, the ACT Work Keys at grade 12, and the writing assessment at grades 4, 7, and 10, except special education students whose individualized education program specifies that the student shall be excluded from the statewide assessment program. An alternative form of assessment must be conducted for those special education students who do not participate in the statewide assessment program. (Policy 2340; Policy 2419; Policy 2510)

5.6.20. The county board develops a mission statement and goals that are aligned with state goals and implements education programs to meet the goals. (Policy 2510)

5.6.21. A certificate of proficiency, or an electronic portfolio when available, is issued to each graduate. (Policy 2510)

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

5.6.23. 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, or language indicating competency for a basic skills warranty. Every student who scores at or above the 70th percentile at grade 11 in reading, mathematics, or 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)

5.6.24. 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 job performance by including activities related to board membership and governance effectiveness.

5.7.1. Training is designed to enhance board members' understanding of the education process and its programs and to develop leadership skills. (W.Va. Code §18-5-1a)

5.7.2. 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 state board, including effective board service, personnel relations/development, policy development, school finance, curriculum and instruction, school law, communication, community relations, and leadership. (W.Va. Code §§18-2E-4 and 5 and 18-5-1a)

5.7.3. 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 §18-5-1a)

5.8. Personnel Qualifications. 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 state board policy; and promote the development of human resources.

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

5.8.2. Professional educators are licensed for their assignments. (W.Va. Code §18A-3-2; Policy 5202)

5.8.3. Other professional employees required to be licensed under state board policy are licensed for their assignments. (Policy 5202)

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

5.8.5. Personnel providing supervision or services to students engaged in extracurricular activities meet the qualifications for their assignments. (W.Va. Code §18A-3-2a; Policy 5202)

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. Professional development activities are designed to meet the identified needs of professional and service personnel by upgrading their knowledge and skills. (Policy 5500; Policy 5500.2)

5.9.2. The school personnel evaluation process provides for the improvement of job performance, promotes professional growth and development and serves as a basis for employment decisions. (Policy 5310; Policy 5314)

5.9.3. Excellence in teaching is acknowledged through recognition programs at the county or school level. (Policy 2510)

5.9.4. The county board administers and implements a staff development program for professional educators and service personnel that conforms with W.Va. Code, state board policies, and county board policies. (W.Va. Code §18A-3-8; Policy 5500)

5.9.5. County board administrators annually complete at least seven of the required eighteen hours of staff development in activities related to leadership. (W.Va. Code §18-2E-5)

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

5.9.7. The county board develops and implements a beginning educator induction program and a beginning principal internship program. (W.Va. Code §§18A-3-2b and 2d; Policy 5899; Policy 5900)

5.9.8. The county board adopts and implements an evaluation policy for professional and service personnel that is in accordance with W.Va. Code, state board policy, and county policy. (W.Va. Code §18A-2-12; Policy 5310; Policy 5314)

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

5.10.1. The county develops and implements a policy for grading. (Policy 2510)

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

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

5.10.4. Staff demonstrate high expectations for each student. (Policy 2510)

5.10.5. School personnel assess students' progress toward mastering subject content and provide reteaching and enrichment opportunities for all students including honors and advanced placement, remediation, and acceleration. (Policy 2510)

5.10.6. 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)

5.10.7. 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)

5.10.8. All students have equal education opportunities. (Policy 2510)

5.10.9. Lesson plans are prepared in advance and the principal reviews and comments on them at least once each semester. (Policy 2510; Policy 5310)

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

5.10.11. Performance data are analyzed prior to the start of the school term and used to improve student achievement. (Policy 2510)

5.10.12. 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)

5.10.13. Students who demonstrate poor academic performance and/or engage in disruptive behavior are identified and appropriate instructional and/or behavioral intervention strategies are implemented within the regular instructional program or students are referred immediately for multi-disciplinary evaluation and receive sustained intervention services. (Policy 2510)

5.10.14. 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)

5.10.15. A Student Assistance Team is established and functioning. (Policy 2510)

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

5.11. Safe and Disciplined Schools. The county and school maintain a safe and disciplined learning environment that ensures the physical, social, and emotional well being of students.

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

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

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

5.11.5. The county has implemented: a policy governing disciplinary procedures; policies governing student due process rights and nondiscrimination; 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)

5.11.6. The county and schools implement the Racial, Sexual, Religious/Ethnic Harassment, and Violence policy. (Policy 2421)

§126-13-6. County and School Improvement Plan Process.

6.1. Each county board develops and submits a Unified County Improvement Plan or an equivalent strategic plan to the West Virginia Department of Education 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.

6.2. Each school develops a Unified School Improvement Plan or an equivalent strategic plan by September 30, 1997, and annually submits to the West Virginia Department of Education 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.

6.3. The county superintendent and board president for the Unified County Improvement Plan, and each school's principal for the annual school checklist, shall sign a statement acknowledging that the information submitted 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.

6.4. 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.

§126-13-7. School Accreditation Status.

7.1. The information submitted for each school shall be reviewed annually by the department of education staff, and the West Virginia Board of Education shall issue every school one of the following: (1) full accreditation status, (2) probationary accreditation status, or (3) seriously impaired status.

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

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

7.3.1. Whenever a school is issued probationary 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 full accreditation status within one year. The plan shall include objectives, a timeline, and cost estimates for achieving full accreditation status. If an acceptable plan is presented to the West Virginia Department of Education, the county and school shall have twelve (12) calendar months to implement the revised Unified School Improvement Plan for compliance.

7.3.2. If the revised Unified School Improvement Plan submitted to the West Virginia Department of Education is not acceptable, the state superintendent may return the plan to the county board for modification or may modify the plan in consultation with the county board and accept the plan as modified.

7.4. 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 State Board determines that extraordinary circumstances exist.

§126-13-8. Seriously Impaired Status. A school shall be considered to be seriously impaired by the State Board when one or more of the following conditions exist:

8.1. The total basic skills score for one or more grade levels in grades 3 through 11 is at or below the 30th percentile in the most recent year for which data are available and one (1) of the two (2) preceding years.

8.2. 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.

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

8.4. 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.

8.5. 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 may include the following: failure of a school issued probationary status to improve its status; 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 state board policies that impacts 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. (Policy 1340)

8.5.1. When a school is seriously impaired, the state superintendent, with the approval of the West Virginia Board of Education, shall appoint a team of three improvement consultants to make recommendations within sixty days for correction of the impairment.

8.5.2. 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 in correcting the impairment is not made within six months of receipt of the recommendations, the state superintendent shall provide consultation and assistance to the county board to (1) improve personnel management, (2) establish more efficient financial management practices, (3) improve instructional programs and policies, or (4) make such other improvements as may be necessary to correct the impairment.

8.5.3. If the school's impairment is not corrected within one year of receipt of the recommendations, the county board shall be issued nonapproval status.

8.5.4. Whenever a school is issued probationary status or 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.

§126-13-9. County Approval.

9.1. The information submitted by each county board shall be reviewed annually by the Department of Education staff, and the West Virginia Board of Education shall issue every county board one of the following: (1) full approval, (2) conditional approval, (3) probationary approval, or (4) nonapproval.

9.2. Full approval shall be issued to a county board whose educational system meets or exceeds all of the high quality educational standards adopted by the West Virginia Board of Education and whose schools were issued full accreditation status. Full approval is for a period not to exceed four years.

9.3. Conditional approval shall be issued to a county board whose educational system meets at least ninety-five percent (95%) of the high quality standards and in which at least ninety percent (90%) of the schools have been issued full accreditation status provided no school is seriously impaired. County boards that have fewer than ten (10) schools may be granted conditional approval status without regard to the ninety percent (90%) rule based on the total quality of the county education program. To be eligible for conditional approval status, county boards with fewer than ten (10) schools shall have no more than one (1) school on probationary accreditation status and no school shall be seriously impaired.

9.4. Probationary approval shall be issued to a county board whose educational system has met fewer than ninety-five percent (95%) of the high quality standards or in which eleven percent (11%) or more schools have been issued probationary or seriously impaired status.

9.5. If the high quality standards and annual performance measures are not met within one year from the date the probationary approval is issued to a county board, the schools within the county must reach the level of full accreditation status or the county board shall be automatically issued nonapproval status. Nonapproval is also issued to a county board that fails to submit a Unified County Improvement Plan or fails to demonstrate a reasonable effort to meet the high quality standards. A "reasonable effort" is defined as meeting the objectives and timelines specified in the Unified County Improvement Plan.

9.6. The West Virginia Board of Education may confer nonapproval status on 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; a casual deficit for two (2) or more years; a budget deficit above three (3) percent for any one year; 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; or failure to provide a high quality and equal educational opportunity for students. (Policy 1340)

9.6.1. Whenever nonapproval status is issued to a county board, the West Virginia Board of Education shall declare a state of emergency by written notification to the county board and may intervene in the operation of the county board. The West Virginia Board of Education may intervene in the operation of the county board to: (1) limit 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; (2) take such direct action as may be necessary to correct the impairment; and (3) declare that the office of the county superintendent is vacant. (W.Va. Code §18-2E-5(g))

9.6.2. Nonapproval and intervention are not required if probationary or seriously impaired status schools improve the level of performance between current performance and performance for full approval. Deferral of intervention in county boards with probationary or seriously impaired status schools shall be determined by the state superintendent and the West Virginia Board of Education.

§126-13-10. On-Site Reviews.

10.1. To assist the West Virginia Board of Education in determining the accreditation status of schools and the approval status of county boards, the State Board shall appoint education standards compliance review teams to make unannounced on-site reviews of the educational programs in any school or county board in the state to assess compliance of the school or county board with the high quality education standards and performance measures adopted by the West Virginia Board of Education.

10.2. The teams shall be composed of no more than ten persons, not more than half of whom may be members of or currently employed by the West Virginia Board of Education, who possess the necessary knowledge, skills and experience to make an accurate assessment of education programs. The teams shall be chaired by a member of the Department of Education staff.

10.3. The education standards compliance teams shall report the findings of their on-site reviews to the West Virginia Board of Education for inclusion in the determination of a school's or county board's accreditation or approval status as applicable.

10.3.1. The county board and school shall correct all on-site review findings of noncompliance within one year of West Virginia Board of Education approval of the report. If any findings of noncompliance have not been corrected, the school shall automatically be issued probationary accreditation or seriously impaired status.

10.3.2. The West Virginia Board of Education may at any time issue a school or county board any appropriate status based on the on-site review report.

10.3.3. Exemplary performance of schools, programs, and educators identified by on-site review teams shall be recognized through the on-site review report.

10.3.4. 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.

10.4. If, during an on-site review, a school or county board is found to be in noncompliance with one or more standards, a written plan for compliance shall be submitted to the West Virginia Department of Education within thirty (30) days of receipt of the draft written report. The plan shall include objectives, a timeline, and cost estimates for achieving full accreditation status.

10.5. If an acceptable plan is presented to the West Virginia Department of Education, the county board has twelve (12) calendar months to implement the plan for compliance. During that time, a school or county board may request that appropriate department staff return to the county board to verify its completion of the plan for compliance. If compliance is verified, a recommendation shall be made to the West Virginia Board of Education, through the state superintendent of schools, to change the approval status of the county board or school.

10.6. If the plan submitted to the West Virginia Department of Education is not acceptable, the state superintendent 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.

10.7. Accreditation status information shall be made available to the legislature, the governor, the general public and to any individual who requests such information.

10.8. At the direction of the state superintendent or by random selection, an unannounced on-site review shall be conducted by the Department of Education staff of any school or county board for purposes of verifying data reported by the school or county board, documenting compliance with policies and laws, and/or investigating official complaints that allege the school or county board is in violation of policies and/or laws under which schools and county boards operate.

10.9. County boards shall be selected for an on-site review by a weighted random sample. Each county board shall be weighted so that those with lower performance measures and those that have not had a recent on-site review have a greater likelihood of being reviewed.

10.10. The on-site review process will include compliance with the high quality standards, but primary emphasis will be placed on the school and student performance measures.

2320 final 12/12/96

**POLICY 2320: PERFORMANCE BASED ACCREDITATION SYSTEM
COMMENT LOG**

September 12, 1996 - October 31, 1996

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section I - General

10/25/96 Mark Carl Fawcett
 Counselor--Magnolia H.S.
 601 Maple Avenue
 New Martinsville, WV 26155

So much time and energy is wasted in the process of trying to document meeting constantly changing performance measures that it seriously impairs the education process. In addition the measures are written in such a manner as to be extremely difficult to track, calculate, or document.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 2 - Purpose

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 3 - Responsibility

10/17/96 Linda K. Wildman
 PO Box 31
 Pine Grove, WV 26419
 4.5- Why must the promotion rate be at or above 95%
 in grades K-8 if we are expecting all students to
 master all goals?

10/30/96 William A. Toussaint
 WVDE, Bldg. 6, Rm. 362
 Yet I wonder about Goal 3.1.f. Can the functionally
 illiterate normally learn a language which is not written
 pictorially, e.g., Chinese, even Japanese (as aided by 2
 alphabets)?

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 4 - Annual Performance Measures

10/16/96	Raymond White PO Box 6 Joffey, WV 25114	4.2 - Attendance Rates - I feel that gradually moving from 90% to 93% is not reasonable. Particularly for secondary schools. I think it would be reasonable for the rate to be 91% for secondary schools and 93% for elementary schools.		
10/17/96	Linda K. Wildman PO Box 31 Pine Grove, WV 26419	4.6 - If K-4 could be kept to a maximum of 15, these students would have a greater chance at individual help and more success.		
		4.11 - What is the national unemployment rate now? Are all the unemployed in college or vocational training now. Are we being realistic?		
		4.12 - What happens if you cannot get 60% of parents involved?		
		4.14 - Too idealistic?		
10/17/96	Hampshire County Board of Education 46 South High St. Romney, WV 26757	4.1 - 60% of students at or above 50%ile would be reasonable expectation. Eliminate reference to 75% and 15%iles.		
		4.3 - Drop out rate should be consistently figured for grades 10 to 12 or 9 to 12 statewide.		
		4.11 - 75% employment and attending higher education not 85%.		
10/22/96	Jerry Linkinogor Box 120 Clay, WV 25043	90% graduation cannot be met as it is presently calculated. Please review this process.		

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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**Section 4 - Annual Performance Measures
(Continued)**

10/25/96 Mark Carl Hawcell
 Counselor--Magnolia H.S.
 601 Maple Avenue
 New Martinsville, WV 26155

- 4.7- What about teacher/pupil ratios at 7-12 grades?
- 4.11- Who is going to track down all graduates to determine this?
- 4.15- Not measurable, nor is it realistic.

10/29/96 Carol E. Fultz
 Coord. Of Voc./Adult Educ.
 Hampshire High School
 Route 50 East
 Romney, WV 26757

- 4.3- Provisions for waivers of this standard should be considered as systems implement and issue standards. Data indicates that dropout rates do increase for about 3 years when systems begin the process of raising standards.
- 4.5- Promotion rates are in conflict with the concept of mastery. This standard could encourage systems to advance students without skills in order to be in compliance.

4.5 should read: The mastery rate is at or above ninety-five 95% in grades K-8.

10/30/96 Martina Mills
 PO Box 925
 Chapmanville, WV 25508

- 4.11- These percentages should be increased to 90% and 95% with some allowance for those unable to attend college or participate in work. Ex. Raising a family, health restrictions, etc.
- 4.1- Any educational consultant or veteran teacher realizes when curriculum changes, textbook changes, administration changes, that test scores will fluctuate from year to year. Also, environmental factors, like consolidation, have an impact on test scores.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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**Section 4 - Annual Performance Measures
(Continued)**

10/30/96
 Martina Mills
 PO Box 925
 Chapmanville, WV 25508

4.2- Schools with low socio-economic counties must live with the fact that many parents put little emphasis on their children's education. There should be stricter penalties on these parents.

4.6- Because of so many at-risk students and the mandated
 4.7- teaching curriculum, class size for middle school and high school should be consistent with elementary. Also
 The formula for computing pupil-teacher ratio should be revamped to elevate, librarians, counselors and deans.

10/30/96
 William A. Toussaint
 WVDE, Bldg. 6, Rm. 362

None here, yet I wonder about Goal 3.1.f. Can the functionally illiterate normally learn a language which is not written pictorially, e.g., Chinese, even Japanese (as aided by 2 alphabets)?

Excellent!

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards

9/5/96
 Betty Sue Phillips
 1025 Fairfax Street
 Fairmont, WV 26554

I'm writing concerning the extra fifteen minutes added to the elementary school day.
 I'm a first grade teacher at East Park, Marion County.
 Buses arrive at 8:00 a.m. and leave until after 4:00 p.m.
 This day is already too long.
 The primary students have a day that is too long.

9/6/96
 Mrs. Doris Lea Cain
 254 Homewood
 Fairmont, WV 26554

I am writing in regard to the suggested fifteen minutes added on to the regular school day.
 As a teacher, parent, and grandparent, I feel this is not in the best interest of the child. I feel that the day is long enough and children become too tired to accomplish much.
 After 6 1/2 hours of instruction. The last 30 minutes of the day are already exhausting for many of the children. Since so many are bused, they leave home around 8:00 and do not get home until after 4:00.

9/9/96
 Martha Cordray
 6th grade
 Marion County

It has come to my attention that there is a move to extend elementary school days 15 more minutes. Because many of our counties are rural ---- bus schedules must run like clock work. I feel that the way our day will be extended is to take away recess. Our recess is only 20 minutes as it is -- much needed break in the structured school day-- for teachers and students.
 We are doing a good job in the schools. Our test scores are up. Please don't lower our morale by extending the day.
 We work hard each day. We cover the material and care about our students. When it's time to go home--we are ready. Our school is old and no air conditioning. Please leave our day as it is . . .

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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**Section 5 - High Quality Standards
(Continued)**

9/9/96 Mrs. Turner

Adding 15 minutes to our day will not benefit the children. The children already have a very long day. If extra time is needed we can adjust our schedules for the academics.

9/11/96 Lois Ann Garrett

1025 Fairfax Street
 Fairmont, WV 26554

This letter is in regard to the extra fifteen minutes added to the elementary/middle level students day. I teach at East Park Elementary School. We have buses coming to school around 8 o'clock A.M. Some students' buses do not pick our students up until after 4 o'clock. This makes a very long day. This means that some students catch a bus in the dark and return home at dark in the winter months.

9/17/96

Anne Schooley
 Music Specialist
 East Park Elem. School
 Fairfax Street
 Fairmont, WV 26554

I am writing to you to voice my opposition to an extra 15 minutes that might be added to the school day at the middle and elementary school levels. Surely, you must realize that we are at a maximum now as far as pushing to the limits of time at school, and including getting on the buses and arriving back home. Seventy-five percent of our children board buses before 7:30 in the morning and in the later winter hours get home after dark. By the end of the school day the hours of intense work that is put in by teachers and students is at a maximum at the present time. Of greatest concern in all of this is the fact that by lengthening the school day you are increasing stress to children who are already stressed out by the time 3:00 P.M. arrives and currently we cannot dismiss until 3:35. Adding additional time would probably negate some of what we have accomplished during the day due to anxiety, stress, tiredness and overextended, unnecessary time that needs not be in the school day.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
(Continued)

(Continued)
 Anne Schooley

Please consider this option of adding 15 minutes to the school day as being one of speculation only. This is not a desirable addition to our school system as we now function. Many of our buses take 30 minutes to arrive after the school day is over.

9/18/96 Marion Uli

This letter is in regards to the proposal to extend school fifteen minutes for elementary schools in West Virginia. I oppose this option. Kindergarten, first and second grade students get tired now. According to the Communication Department at WVU, if a student is tired, he/she will not learn. Also, I would like to say that during the school year, we have the students more during the "waking" hours than their parents do. I feel we need to consider the value of family time. A third point is that I feel a kid should be a kid for just a little while. Japan has suffered high teen suicide due, in part, to the amount of pressure to succeed. Thank you for your time and consideration.

9/30/96 Jeanne Moore, Coordinator
Fine Arts, WVVDH

Page 7, old No. 2.1.25 - Please restore this statement to be consistent with revised policies 2510 and 2520.
 Page 8, No. 5.11.21 - The electives are listed in both policies 2510 and 2520. Both should be mentioned in this item.

10/17/96 Hampshire County Board of Education
46 South High Street
Romney, WV 26757

1.25- Eliminate this requirement (Physical Fitness Test)
 10.11-Excellent idea but state needs to add at least 2 days to employment term.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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**Section 5 - High Quality Standards
(Continued)**

10/25/96 Mark Carl Fawcett
 Counselor, Magnolia H.S.
 601 Maple Avenue
 New Martinsville, WV 26155

5.10.6-Counselors spending 75% of their time in student activities is a cruel joke when WVEIS required state testing programs take 50% of a counselor's time.
 Why no specific requirement for counselors in schools K-12? Ratios - are listed for teachers and principals.

10/29/96 Carol E. Fultz
 Coord. Of Voc./Adult Educ.
 Hampshire High School
 Route 50 East
 Romney, WV 26757

5.1.18-Dates need re-evaluated. Dates established need to be achievable by most systems. Core daily requirements will hamper block scheduling in middle school.
 5.1.22-Change "to explore" to "for in depth exploration"
 5.1.25-Remove 5.1.25
 5.1.26-Change 11-12 to 9-12

10/29/96 Carol E. Fultz
 Coord. Of Voc./Adult Educ.
 Hampshire High School
 Route 50 East
 Romney, WV 26757

5.1.28-Delete additional 15 minutes requirement.
 The only area that is missing in the accreditation process is the area of numbers or percentages of students achieving the successful completion of a program of study. I believe school systems should be recognized for having a large percentage of students completing a program of study. I believe that beginning with the year 2001, at least 90% of students ought to achieve this goal.
 The Certificate of Proficiency or Warranty needs to be tied to: At least 50th percentile on standardized test.
 Completion of a program study.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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**Section 5 - High Quality Standards
 (Continued)**

10/30/96
 Martina Mills
 PO Box 925
 Chapmanville, WV 25508

5.18- There needs to be some kind of competency testing for all electives. There teacher need to also be held accountable for their curriculum. This procedure is taken very serious in other states.

5.28- Because of consolidation, many students are on a bus 1 hr. prior to school and 1 hr. After, this is absolutely absurd. They are exhausted by the end of the day. Also, we were taught in the Middle School Curriculum that More is not necessary better. Remember the attention span of children in this era is much less than previous years.

10/30/96
 William A. Toussaint
 WVDE, Bldg. 6, Rm. 362

5.42- The students, who lack interest and/or at-risk need to be in some alternative program. In Logan County, only a marginal amount of students, who are at-risk, in middle school and given this opportunity. Also, those students with chronic discipline problems need not be placed in our public schools, but put in a military-type environment.

At 5.5.3 on page 10, the health licensing and inspection law is W.Va. Code 16-1-10, attached.
 §5.6.1 could also cite §18-5A-1 et seq.
 §5.6.5 could also cite §18-5-22a and 23.
 §5.6.12 could also cite §18-10-8.
 §5.9.4 should also cite §18A-3-9 and Policy #5500.02.
 §5.11.5 could also cite §18A-5-1a.
 §5.11.6 could also cite §18A-2-9 and 18-5-15a.

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

Section 6 - County Annual Improvement Process

Date	Individual/Organization	Comments	Action/Type	Rationale
10/29/96	Carol E. Fultz Coord. Of Voc/Adult Educ. Hampshire High School Route 50 East Romney, WV 26767	6.4 - Add intentional before falsification. (P. 18)		
10/30/96	Martina Mills P.O. Box 925 Chapmanville, WV 25508	6.1 - Needs to be more specific and not so vague.		
10/30/96	William A. Toussaint WVDE, Bldg. 6, Rm. 362	Excellent!		

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 7 - School Accreditation Status

10/30/96 William A. Toussaint
 WVDE, Bldg. 6, Rm. 362 Excellent.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 8 - Seriously Impaired Status

10/25/96 Mark Carl Fawcett 8.3- What is the formula of the National Center for
 Counselor-Magnolia H.S.,
 601 Maple Avenue
 New Martinsville, WV 26155
 Education Statistics Dropout Rate?

10/30/96 Martina Mills
 PO Box 925
 Chapmanville, WV 25508
 In-School Suspension should be made mandatory in all
 public schools. This will hopefully cut down on out-of-
 school suspension and attendance criteria may be met.
 However, this environment should be a disciplinary
 environment and not a place to be enjoyed.

10/30/96 William A. Toussaint
 WVDE, Bldg. 6, Rm. 362
 Excellent!

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 9 - County Approval

10/25/96	Mark Carl Hawcett Counselor--Magnolia H.S. 601 Maple Avenue New Martinsville, WV 26155	9.4- At what point do you round up or down to the nearest whole school?		
10/30/96	William A. Toussaint WVDE, Bldg. 6, Rm. 362	Excellent.		

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 10 - On-Site Reviews

10/25/96	Mark Carl Fawcett Counselor--Magnolia H.S. 601 Maple Avenue New Martinsville, WV 26155	10.2- No team of 10 could do a thorough review of Kanawha County Schools.		
10/29/96	Carol E. Fultz Coord. Of Voc./Adult Educ. Hampshire High School Route 50 East Romney, WV 26757	Recognition needs to be given those systems who have 90 to 95% of students at mastery level--on grade level!!!		
10/30/96	William A. Toussaint WVDE, Bldg. 6, Rm. 362	Excellent.		

POLICY 2320: PERFORMANCE BASED ACCREDITATION SYSTEM
COMMENT LOG
November 1, 1996 - November 12, 1996

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 1 - General

ACTION
 N: No Response
 NA: Not Accepted
 A: Accepted

TYPE
 - Negative
 + Positive
 O Neutral

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 2 - Purpose

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 3 - Responsibility

11/12/96 Waverly Elementary
 Faculty Senate
 Waverly, WV 26184

Goal 3 - From what starting point to what mastery level the way it is currently stated (# of H.S. graduates entering post-secondary education will increase by 50%) this number will increase 50% every year. This is not possible since 100% of our kids will not go on to college.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 4 - Annual Performance Measures

11/1/96	Drema Bias PO Box 6630 Chapmanville, WV 25508	4.2 - Schools in poor socio-economic counties must contend with parents that place very little emphasis on education. What should be addressed is penalties or legal action to the parents for not sending their children to school.		
		4.3 - Vocational type of schooling should begin in grades 6-9 for students identified as at-risk students; thus keeping these types of students interested at an earlier age in school.		
		4.5- Students should be held accountable for their actions or lack of. Responsibility is taught at home and it is greatly lacking as each year student's responsibility lessens.		
		4.6- Glass size should be addressed in the secondary grades as well.		
		4.7- When class size is 30, 32, 35 in seven, eight, and ninth grades reaching students is extremely difficult. The class size is TOO much.		
11/4/96	Pamela Roberts Title I Teacher Jeffrey-Spencer Elem PO Box 309 Hewett, WV 25108	4.1- Section 5.1.17 and 5.1.15 state that students not obtaining mastery should be provided reteaching until mastery is obtained yet section 4.1 states that only 50% perform at or above the 50% - this is contradictory! What % is mastery and who or what determines mastery?		
		4.9- All elementary schools need a principal, especially if they have students in grades from Preschool through grade 5.		

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 4 - Annual Performance Measures
 (Continued)

11/6/96 Nancy Underwood
 202 West 8th Avenue
 Huntington, WV 25701 4.5 How can one remediate and still maintain this promotion rate?

11/6/96 Anne Ladden
 218 Highland Avenue
 Oak Hill, WV 25901 4.1 Annual Performance Measures, requires 50% to score at at or above the third quartile. As we meet this goal, the 3rd quartile score increases and it becomes even more difficult to achieve this goal.

4.5 Promotion rate is at or above 95%. Promotion rates should be determined by the needs and abilities of individual children. Schools deal with children not lifeless products. There may be years when more than 5 % will benefit from retention and teachers and parents should be free to use retention as is necessary and beneficial regardless of an arbitrary number set at the state level.

4.11 Percentage of graduates enrolled in college, post-secondary Education or fully employed is 85% This makes the school success dependent on the employment rate, the amount of financial aid available, the number of students who choose to marry and raise families, etc. This is unreasonable.

4.14 60% of graduates will score at or above the 50th percentile, is unreasonable and sounds like aspiring to have all children above average, an unattainable goal in the long-run.

11/6/96 Lawrence Hitt, Principal
 Shepherdstown Elem. Sch.
 410 S. Church St.
 Shepherdstown, WV 25443 4.1 Is this attainable? It appears to me that we are putting too much emphasis on testing results in this policy as well as others. It appears to me that this will put a great deal of pressure on schools, principals, teachers, and students.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 4 - Annual Performance Measures
 (Continued)

11/6/96	Eileen Poling/TCEA & TVEMS 215 Homewood St. Parsons, WV 26287	Attendance rate We have no control over this. % Who came up with these numbers. Quit dealing with numbers and deal with individual students. We've studied hard and worked diligently to know what to do!		
11/6/96	Jennifer Wood PO Box 943 Shepherdstown, WV 25443	4.5- Promotion Rate - Is this realistic? How can remediation occur and still keep up with promotion rate?		
11/6/96	Phyllis Herman/PIA Advisor/ Tucker County HS Rt. 1, Box 153 Hambleton, WV 26269	4.5- How can you remediate and still keep up this promotion?		
11/7/96	Robert Miller/Mineral Co. Schs. One Baker Place Keyser, WV 26726	4.5- Delete sentence. Forcing an increase in promotions does nothing (by itself) for student achievement and responsibility.		
11/7/96	Ann Thornburg 101 Blackberry Hill Barboursville, WV	4.5- Promotion rate - How can you remediate and still keep up this promotion rate?		
11/8/96	Christina Graddock Jeffrey Spencer Elem. RR 1, Box 394 Lake, WV 25121	4.1- Section 5.1.17 and 5.1.15 state that students not obtaining mastery should be provided reteaching until mastery is obtained yet section 4.1 states that only 50% perform at or above the 50%-this is contradictory! What % is mastery and who or what determines mastery?		

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 4 - Annual Performance Measures
 (Continued)

11/8/96 (Continued)
 Christina Graddock 4.9. All elementary schools need a principal, especially if they have students in grades from Preschool through grade 5.

11/8/96 Cornelia Bolton 4.1. Section 5.1.17 and 5.1.15 state that students not
 Jet. 1, Box 260-E obtaining mastery should be provided reteaching
 Danville, WV 25053 until mastery is obtained yet section 4.1 states that
 only 50% perform at or above the 50%--this is contradictory! What % is mastery and who or what determines
 mastery?

11/8/96 Betty Ann Williams 4.9. All elementary schools need a principal, especially if they
 Sherman Elem. have students in grades from Preschool through grade 5.
 PO Box 369
 Seth, WV 25181

11/8/96 Kirk King 4.9. Jr. High and High Schools performance measures should be
 Boone County Schools much stricter than grade schools. Students who excel in
 4708 Lancaster Avenue grade school will tend to go down while in Jr. High and High
 Charleston, WV 25304 School.

11/8/96 Both Thompson 4.9. Principal full time. There seems to be a minimum
 Sherman Elementary number required for a full time principal. With more
 Gen. Del. consolidation occurring I would like to see a maximum
 Comfort, WV 25049 number of students allowed before a vice-principal is
 added to an elementary school.

11/8/96 Both Thompson 4.9. We should consider carefully when imposing and measuring
 Sherman Elementary performance of students in a low income, rural area as
 Gen. Del. opposed to a higher income, city school district. These
 Comfort, WV 25049 students may come from different home life situations.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 4 - Annual Performance Measures
 (Continued)

11/12/96	Janet Goodhand 903 S. Washington St. Berkeley Springs, WV 25411	4.1- This is confusing! Does this address grade level percentiles or total school percentiles?		
		4.3- This is a better method but calculate on 7-12 enrollment statewide. This brings equality to calculations for all secondary schools.		
		4.4- Lower graduation rate to 83%.		
		4.5- Promotion rate should remain at 92%.		
		4.11- Eliminate until more data on these standards is collected over at least 2 years.		
		4.14- Eliminate this item. This is a higher standard than expected in 4.1.		
		4.15- Eliminate this item.		
		4.16- Clarify this item.		
11/12/96	Sharon Schlaegel PO Box 115 Madison, WV 25130	4.1- Section 5.1.17 and 5.1.15 state that students not obtaining mastery should be provided reteaching until mastery is obtained yet section 4.1 states that only 50% perform at or above the 50%--this is contradictory! What % is mastery and who or what determines mastery?		
		4.3- All elementary schools need a principal, especially if they have students in grades from Preschool through grade 5.		

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 4 - Annual Performance Measures
 (Continued)

11/12/96 Waverly Elementary 4.9 Lower net enrollment to 160 students for a full time Faculty Senate principal. Waverly, WV 26184

11/12/96 Glenda Follert As long as percentiles are used on child must fall at each P0 Box 328 percentile. There should be no exemptions regardless of grade. A kindergarten class should have no more than 18. Reader, WV 26167 There should be a minimum set amount of pupil expenditures.

11/12/96 Garra Fluharty As long as percentiles are used, one child must fall on P0 Box 328 each percentile. Reader, WV 26167 There should be no exemptions regardless of grade level. There should be a minimum set amount for pupil expenditure.

11/12/96 Kay Blair As long as percentiles are used, one child must fall at each Short Line School percentile. Box 328 Attendance - we need something done if they don't attend. Reader, WV 26167 There should be no class exemptions in any grade K-6. Twenty-five is enough for one teacher to handle.

4.10 Some mini dollar amount needs to be set.

4.11 How can we be responsible for former employment or post-graduate work of students?

4.12 How do you calculate this? What is considered parent involvement?

4.13 The percentage should stay at 60%, most parents don't respond to surveys.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 4 - Annual Performance Measures
 (Continued)

11/12/96
 (Continued)
 Kay Blair

4.14- Evidently, you don't understand percentiles.
 4.15- Should be 30%. It is hard to match percentiles and percentages.

11/12/96
 Brenda Nolan
 Short Line School
 Box 328
 Reader, WV 26167

4.11- Depends on the economy and should not be a reflection of the school.
 4.15- How can you match 70th percentile with 33%.
 If percentile is used one student falls at each percentile. How is it possible to have no one in the bottom quartile? There should be no exemptions to the student teacher ratio.
 There should be a minimum allotment set for pupil expenditure.

11/12/96
 Charlene Canterbury
 Short Line School
 Box 328
 Reader, WV 26167

As long as percentiles are used 1 child must fall at every percentile, therefore 25 students will fall in the bottom quartile.
 4.7- There should never be any exemptions to student teacher ratio in elementary.
 * Should be a minimum \$ amt for pupil expenditures.
 4.11- How is school responsible for post graduate employment? Economy!
 4.15- Percentile 70 - percentage 33 - doesn't match up. Check definition of percentile.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 4 - Annual Performance Measures
 (Continued)

11/12/96	Joan Aberegg Box 220 Reader, WV 26167	4.1- As long as percentiles are used, one child will fall at each percentile. There should be no exemptions in kindergarten.		
	4.9- All schools should have a principal regardless of number of students.			
	4.10- There should be a minimum amount set per student.			
	4.11- The school cannot control the local economy.			
	4.14- Do you understand percentiles?			
11/12/96	Gerald Mathias, Supt. 46 S. High St. Romney, WV 26757	4.1- This is confusing! Does this address grade level percentile or total school percentiles?		
	4.3- This is a better method but calculate on 7-12 enrollment statewide. This brings equality to calculations for all secondary schools.			
	4.4- Lower graduation rate to 83%.			
	4.5- Promotion rate should remain at 92%.			
11/12/96	Connie Bakan Short Line School P0 Box 328 Reader, WV 26167	There must be a minimum set for per pupil funding.		
	4.11- is based on economy not the school. It's not the school's fault there are no jobs.			
	4.14- If you understand percentiles this is impossible.			

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 4 - Annual Performance Measures
(Continued)

11/12/96 (Continued) Connie Dakan	4.15- Doesn't make sense if using percentile. If percentile is used one child must fall at each percentile. How is this possible? According to this 25% of students must fall in the lowest percentile. There should be no exemptions to the student-teacher ratio. Also 25 students is too many for 3rd grade.			
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11/12/96 Dixie Lee Holbert, Teacher Short Line School PO Box 328 Reader, WV 26167	<ul style="list-style-type: none"> - As long as percentiles are use, one child must fall at each percentile. - No exemptions in any grade. - Some minimum set dollar amount (Should be). - How is school responsible for employment or post graduate work? - What constitutes parent involvement? - Ref. Stanford - Should be 50%, not 60%; it is difficult to match percentile and percentages. 	4.13 Should be 30% not 50%.		
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11/12/96 Charles Duffy/RESA VIII 109 S. College St. Martinsburg, WV 25401	4.1- What does this mean? Is the state going to combine all grades tested in a school to determine % above 50%ile or is this grade-by-grade?	4.3- This method of calculating dropout rate will produce a lower rate and will work fine for county and state calculations. However, there must be mathematical corrections for number of grades in secondary schools.		
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ACTION TYPE
 N: No Response - Negative
 NA: Not Accepted + Positive
 A: Accepted O Neutral

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 4 - Annual Performance Measures
 (Continued)

11/12/96	(Continued) Charles Duffy	4.4- Graduation standard is way too high. The graduation rate should be numerically related to the dropout rate. If 5% of students drop out each during grades 9-12 the graduation rate would be approximately 80%. The current high standard is 83% and should be kept.		
		4.5- Leave promotion rate at 92% until new programs and testing system are producing results.		
		4.11- Eliminate until more data on those standards are collected over at least two years.		
		4.14- Eliminate this performance measure. This is similar to Standard 4.1 but higher.		
		4.15- Eliminate this item.		
		4.16- Confusing - Please clarify.		
11/12/96	Beverly S. Prince-Teacher Wirt High PO Box 219 Elizabeth, WV 26143	It will be hard to remediate and still keep up promotion rate.		

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 4 - Annual Performance Measures
 (Continued)

11/12/96: Alice R. Burgess
 Short Line School
 PO Box 328
 Reader, WV 26167

- As long as percentiles are used, one child must fall at each percentile.
- Pupil/teacher ratio - These should be no exemptions in any grade.
- There should be a minimum set dollar amount set.
- How can the school be held responsible for employment or past-graduate?
- What constitutes parent involvement?
- If it is the 70% percentile, it should be 30% not 33%. It is difficult to match percentile and percentages.

11/12/96: Charles Blair
 Short Line School
 PO Box 328
 Reader, WV 26167

- As long as percentiles are used one child must fall at each percentile.
- Pupil teacher ratio - There should be no exceptions in any grade.
- Should be some minimum set dollar amount.
- How is the school held responsible employment after graduation?
- What makes parent involvement?
- It is difficult to match percentile and percentage.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards

11/1/96
 Drama Bias
 PO Box 660
 Chapmanville, WV 25508

5.4- What alternate course of action can be taken when students do not want to meet these high expectations?

5.15- Some students will not achieve the master of certain instructional goals and objectives. If you reteach and reteach them not much material will be covered plus other students are not challenged thus we are not meeting high expectations for All students.

5.13- I feel secondary students should be tested on their fine art classes of art, music, etc.

5.28- Adding an addition 15 minutes to the educational day is unrealistic in a rural county where students spend almost an hour on the school bus coming to school and going home. This puts an additional hardship on these students. I work with the students daily and I know first hand that these youngsters at this age level (Middle School) would have difficulty sitting 15 more minutes in class. This idea would not benefit the children which the educational system is suppose to help.

5.4.2- I truly would like to see viable alternative educational programs simply put in place in Logan County so that we can reach these at-risk students without hindering the education of other students.

5.6.4- There needs to be a day/days set aside in the school calendar for parents to "attend school" while the the students are not present.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
 (Continued)

11/1/96 (Continued)
 Drema Blas

5.6.6- This is an area of great concern. If records of students where monitored closely and reviewed from kindergarten throughout school. It would show that the same student that was chronically absent in kindergarten continues this each year that follows. The parents of these students need to be dealt with more harshly for their lack of parental guidance. They are ultimately the ones that their follow by example.

5.6.15- Just putting these code of conduct for students up and reading/discussing with students does very little. This policy needs clear out actions when students fail to follow those steps in the policy. Actions speak louder than words.

5.10.1- To be consistent there should be a statewide grading policy as with statewide testing assessment.

5.10.14- What are those sustained intervention services?

5.11- Until something concrete is formulated and practiced. Students have no fear, no remorse for their actions. When were teachers rights abolished?

5.1.12- Does daily access mean scheduled daily time or that it is available. Small schools have no librarian and there is not enough time in the day to allow scheduled time for all.

11/4/96
 Pamela Roberts
 Title I Teacher
 Jeffrey Spencer Elem.
 PO Box 309
 Hewett, WV 25108

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
 (Continued)

11/4/96
 (Continued)
 Pamela Roberts

5.15- Can reteaching be handled by regular classroom teacher? If not, schools do not have the additional resources to meet this criteria.

5.1.17- Can not ensure mastery for every child. Teachers need training in pre, teach, and reteach methods. Schools have a lack of personnel to accomplish this.

5.1.18- Insufficient certified personnel to meet compliance. Why do children need a foreign language before high school?

5.1.22- Not enough resources in small schools and community.

5.1.25- IMPOSSIBLE! Some students only receive a small amount of Phys. Ed. For 50% of the students to pass The fitness test they would have to put in a lot of Practice time at home and this will not happen.

5.1.28- Will teachers be required to work more than 8 hours a day--will they be paid overtime?

5.5.16- Why do high schools on block scheduling receive a 90 minute planning time to plan for 3 classes and elementary teachers receive only 30 minutes to plan for 8-10 different classes?

5.11.3- Elementary age students do not have the necessary critical thinking skills to accomplish this.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
 (Continued)

11/4/96 Jack G. McClanahan, Ed.D.
 Deputy Superintendent
 Kanawha County Schools
 200 Elizabeth St.
 Charleston, WV 25311

5.10- The wording on 5.10.1 should read "principal or designee" because in the larger high schools a principal must observe and evaluate 75 teachers This is an impossible task given their other responsibilities.

11/6/96 Nancy Underwood
 202 West 8th Ave.
 Huntington, WV 25701

5.1.18- Add developmental guidance-life skills-esp. good for self-esteem and team dev. - also students need to know to manage their lives/homes after work.
 5.1.19 Strike and change to supporting life skills objectives Such as child dev., parents steps, adult roles, consumer ed.

5.1.10- Real value is provided by clubs, activities, and assemblies. Please do not eliminate students chances for this.

5.1.21- I would like to see these changes because families And family life definitely impacts work place morale and productivity.

11/6/96 Anne Latten
 218 Highland Avenue
 Oak Hill, WV 25901

5.1.15- Reteaching is provided. This sounds fine until it is considered that the State Department is determining the best way to teach individual children when there is a whole host of options from which the best for the student and teacher should be selected. For example, if one accepts the research of Patricia Cunningham, lessons can be taught at a variety of levels and using multiple modalities, so that little additional tutoring/ reteaching will be necessary. What is necessary is for the educational community to accept the idea that

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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**Section 5 - High Quality Standards
(Continued)**

11/6/96 (Continued)
 Anne Kathan

children learn not in a specific sequence, but in an expansive way more like filling a balloon. Children learn in many directions at once, and the teacher must be free to implementing a more linear approach that demands mastery or reteaching. Young children learn by improving their approximations. As educators we need to honor those approximations.

5.1.17- Daily reteaching. Again, this is but one way to ensure the learning of children and it is inappropriate for the State Department to dictate one particular methodology when there are others that are also effective. In addition, the time spent documenting that this is occurring could be better spent teaching children.

5.1.18- Programs of study . . . this eliminates developmental reading as part of the core curriculum, lumping it with language arts. Surely the skill students need the most is the ability to read; its importance needs to be explicitly stated.

5.1.28- Lengthens the instructional day. This will eliminate the bank time that allows so many teachers, parents, and business owners to participate in site-based management advocated by the State Department. Additionally, what other employees would find their work day lengthened with no mention of compensation.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
(Continued)

11/6/96 (Continued)
Ann e Lathen

5.6.8- Best practices . . . I am concerned about who is determining what is the best practice. What if my professional opinion differs from that of the State Department. Certainly instruction should be based on sound research, but researchers reach varying opinions.

5.10.14- At risk . . . Where is the money to provide this sustained intervention?

11/6/96 Lawrence Hill, Principal
Shepherdstown Elem. Sch.
410 S. Church St.
Shepherdstown, WV 25443

5.1- I have written a letter to oppose the additional time proposals. We do not need to add these minutes. It is already a long day for K-2 students. (Letter dated 9/30/96 in relation to policy 2510)

5.2.2- Is there a format for improvement plans for school/county? When did this come about?

5.10.9- Comments are not necessary on every teachers plans.

5.10.10- It seems to me that this not necessary in light of the current evaluation policy that is in place.

11/6/96 Boone County Kindergarten Academy Faculty
Senate
PO Box 730
Uneda, WV 25205

5.6.2- The county board meets at least once a year with L.S.I.G. . . . We feel that this is a waste of time and just another meeting to attend.

5.6.7- The school and county report cards are disseminated . . .
- These do not have anything to do with quality public education and should not be used. (We feel these are confusing to parents.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
 (Continued)

11/6/96 Bonnie Ritz, Ed.D.
 Ohio County Schools
 2203 National Road
 Wheeling, WV 26003

5.1.17- Grades 3 and 4 should be required to have Science and Social Studies regularly rather than daily. Daily requirements will erode Reading/Language Arts and Mathematics instructional time. Having Science and Social Studies provided during the week is sufficient.

5.1.19- Dual credit college courses taken during high school and are a strong indicator of student success and interest in academic achievement. Dual credit courses transfer to institutions of higher education while Advanced Placement courses frequently do not. Dual credit courses need to be included in the standards and reported on the West Virginia report card.

5.6.23- This standard implies that students not meeting or exceeding the seventieth percentile in designated areas on the statewide standardized test are not able to participate in post secondary education. Expectations for students not reaching this percentile should include post secondary experiences.

5.10.5- College credit courses need to be included in this standard.

5.10.12- Include in this standard and on the West Virginia State Report the number of students in college credit courses. This standard should be advanced placement examination or completion of college credit courses.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
 (Continued)

11/6/96	Eileen Poling/TGEA & TVEMS 215 Homewood St. Parsons, WV 26287	5.12- Impossibility without added staff. 5.1.15- How often and for how long do we re-teach?		
11/6/96	Jennifer Wood PO Box 943 Shepherdstown, WV 25443	5.1.1- STRIKE & CHANGE to: Support Electives such as Child Development, Parenting, STEPS, Adult Roles and Functions, Consumer and Financial Education, Driver's Education, Wellness, Life Skills, Communication, Service Learning. These changes should occur because families and individual impact on work place, morale, and productivity. Societal pressures families are increasing. These ELECTIVES are not only important, but essential to assuring success at home and on the job. Family and Consumer Science Education is EDUCATIONALLY IMPORTANT to all our children. It teaches skills for life. We need to think of the instructional needs of our children. The "Family" and "Learning Life Skills" should be number one in the state and the nation. So do not eliminate Consumer and Homemaking classes.		
		5.1.18- Add: developmental guidance and life skills. Builds self-esteem and team development.		
		5.1.19- Add: supporting electives important to ALL career electives. Real value is provided by clubs, activities and assemblies. Don't eliminate chances for this.		

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
 (Continued)

11/6/96 Phyllis Harman/FHA Advisor
 Tucker County HS Rt. 1, Box 153
 Hambleton, WV 26269

5.1.1- Strike and change to supporting electives such as Child Development, Parenting, STEPS, Adult Roles & Functions, Consumer Finance, Driver's Education, Wellness, Life Skills, Communication, Service Learning.

5.1.18- However, some real value is provided by clubs, activities, assemblies. Don't eliminate for this. ADD: developmental guidance/life skills. Especially good for self-esteem and team development.

I would like to see these changes because families and individuals impact on work-place and productivity. Societal Pressures in families are increasing. I feel these electives are not only important, but essential, to assuring success At home and on the job.

11/7/96 Belores Ranson
 PO Box 770 Ripley, WV 25271

5.1.25- Presidential Physical Fitness . . . Some middle school students have approximately 6 weeks of PE. With block scheduling at the high school level, some students do not have PE until 10th grade. 1. Is 6-week sufficient preparation time?
 2. Will 9th graders who are not taking PE until grade 11 be required to take the test?

5.8- Need to remove all text except "implement employment and assignment practices that conform with State Code and state Board policy." Please not, the above does not ensure that county boards employ personnel who have the ability to deliver high quality programs and services to all public school students to ensure academic success, or that the person will promote the development of human resources.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
 (Continued)

11/7/96	(Continued) Delores Ranson	5.8.1- The code, as it is now written, does not ensure the most qualified Applicant will be employed. Most qualified is not synonymous with 'years of experience,' 'seniority,' 'have taught in the Certified area,' etc. This is State Code...		
11/7/96	Robert Miller/Mineral Co. Schs. One Baker Place Keyser, WV 26726	5.1.15- Its impossible to provide tutorial services to all these students. Either delete "tutorial" or add, "where available"		
11/7/96	Ann Thornburg 101 Blackberry Hill Barboursville, WV	5.6.5- We shouldn't be required to maximize learning potential. This is a Special Ed. Nightmare. Change from "maximize learning potential" to "support student achievement."		
11/7/96		5.1.11- Strike and change to supporting electives such as child development, parenting, STEPS, adult roles and functions, consumer education, drivers ed. Wellness, life skills, communication services learning. These changes are essential because family and all individuals impact workplace, moral and productivity, societal pressures on families are increasing to be successful at work one must feel successful at home.		
11/7/96		5.1.18- However, there are many skills learning during clubs, school activities, and assemblies. Many cannot be involved after school. Don't take this away from our students. Add developmental guidance/life skills. Especially good Self-esteem and Team development.		
11/7/96		5.1.19- Add: support electives which would be important to all career electives.		

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
 (Continued)

11/8/96 Elizabeth Riggsall 5.1.21- Driver's Ed. As an elective - Please keep! Good idea here!
 Faculty Senate President Consider this a true "Life Skill" for School to Work.
 Sissonville High Schools
 6100 Sissonville Drive
 Charleston, WV 25312

11/8/96 Christina Graddock 5.1.12- Does daily access mean scheduled daily time or that it is
 Jeffrey Spencer Elem. available. Small schools have no librarian and there is
 RR 1, Box 394 not enough time in the day to allow scheduled time for all.
 Lake, WV 25121

5.1.15- Can reteaching be handled by regular classroom teacher?
 If not, schools do not have the additional resources to meet
 this criteria.

5.1.17- Can not ensure mastery for every child. Teachers need
 training in pre, teach, and reteach methods. Schools have
 a lack of personnel to accomplish this.

5.1.18- Insufficient certified personnel to meet compliance. Why
 Do children need a foreign language before high school?

5.1.22- Not enough resources in small schools and community.

5.1.25- IMPOSSIBLE! Some students only receive a small amount
 of Phys. Ed. For 50% of the students to pass the fitness
 test they would have to put in a lot of practice time at home
 And this will not happen.

5.1.28- Will teachers be required to work more than 8 hours a day--
 Will they be paid overtime?

ACTION TYPE
 N: No Response - Negative
 NA: Not Accepted F: Positive
 A: Accepted O: Neutral

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
 (Continued)

11/8/96	(Continued) Christina Craddock	5.6.16- Who do high schools on block scheduling receive a 90 minute planning time to plan for 3 classes and elementary teachers receive only 30 minutes to plan for 8-10 different classes?		
		5.11.3- Elementary age students do not have the necessary critical thinking skills to accomplish this.		
		5.11.12- Does daily access mean scheduled daily time or that it is available. Small schools have no librarian and there is not enough time in the day to allow scheduled time for all.		
11/8/96	Cornelia Bolton Rt. 1, Box 260-E Danville, WV 25053	5.1.15- Can reteaching be handled by regular classroom teacher? If not, schools do not have the additional resources to meet this criteria.		
		5.1.17- Can not ensure mastery for every child. Teachers need training in pre, teach, and reteach methods. Schools have a lack of personnel to accomplish this.		
		5.1.18- Insufficient certified personnel to meet compliance. Why do children need a foreign language before high school?		
		5.1.22- Not enough resources in small schools and community.		
		5.1.25- IMPOSSIBLE! Some students only receive a small amount of Phys. Ed. For 50% of the students to pass the fitness test they would have to put in a lot of practice time at home And this will not happen.		

ACTION TYPE
 N: No Response - Negative
 NA: Not Accepted P: Positive
 A: Accepted O: Neutral

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
(Continued)

11/8/96 (Continued)
 Cornelia Bolton

5.1.28- Will teachers be required to work more than 8 hours a day-- Will they be paid overtime?

5.6.16- Who do high schools on block scheduling receive a 90 minute planning time to plan for 3 classes and elementary teachers receive only 30 minutes to plan for 8-10 different classes?

5.11.3- Elementary age students do not have the necessary critical thinking skills to accomplish this.

11/8/96 Betty Ann Williams
 Sherman Elem.
 PO Box 369
 Seth, WV 25181

The number of college fresh men having to take "bonehead" math and English needs to be addressed. Why do students who make all A's in Math and English in High School have to take those classes? It's not their fault.

11/8/96 Kirk King
 Boone County Schools
 4708 Lancaster Avenue
 Charleston, WV 25304

5.1.3- Goals/Objectives - The goals and objectives agreed on given to each teacher in their curriculum areas, i.e., Art, Music, P.E.

5.1.19- Art, Music, PE teachers - teachers to facilitate these needed programs.

5.10- Principal evaluations - It is extremely difficult with larger school to meet this objective. This one reason why I would like to see 4.9 addressed.

11/8/96 Beth Thompson
 Sherman Elementary
 Gen. Del.
 Comfort, WV 25049

As stated above, we must consider the student populations of various schools when setting these standards. However, we must not set goals too low.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
 (Continued)

11/12/96	Janet Goodhand 903 S. Washington St. Berkeley Springs, WV 25411	5.1.18- "conduct daily or equivalent" <u>Explanation</u> - Middle schools would not be able to use the block scheduling option if they are required to teach core programs of study on a daily basis.		
		5.1.25- Eliminate - not attainable - no 2510 standard.		
		5.1.26- Delayed beyond 1997-98. Cover grades 9 to 12 not 11 to 12.		
		5.1.28- Allow waivers as needed due to travel times.		
		5.6.23- Eliminate 70% wke warranty.		
		5.7.2- Incorrect. All board members must receive 7 hrs. annually.		
		5.7.3- Incorrect. Every newly elected member must receive orientation.		
		5.9.5- Eliminate this requirement. What is leadership?		
		5.10.12- Eliminate.		
11/12/96	Carol Lucas 1750 Martha Road Barboursville, WV 25504	5.1.18- <u>Advantages of keeping family and consumer sciences in the curriculum:</u> Career readiness and exploration Application of math, reading and language skills Offers skills for life: time management, personal and family relationships, child care skills, food preparation, clothing care, home safety and involvement in a youth organization.		

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
 (Continued)

11/12/96	Sharon Schlaegel PO Box 115 Madison, WV 25130 Lake, WV 25121	<p>5.1.12- Does daily access mean scheduled daily time or that it is available. Small schools have no librarian and there is not enough time in the day to allow scheduled time for all.</p> <p>5.1.15- Can reteaching be handled by regular classroom teacher? If not, schools do not have the additional resources to meet this criteria.</p> <p>5.1.17- Can not ensure mastery for every child. Teachers need training in pre, teach, and reteach methods. Schools have a lack of personnel to accomplish this.</p> <p>5.1.18- Insufficient certified personnel to meet compliance. Why do children need a foreign language before high school?</p> <p>5.1.22- Not enough resources in small schools and community.</p> <p>5.1.25- IMPOSSIBLE! Some students only receive a small amount of Phys. Ed. For 50% of the students to pass the fitness test they would have to put in a lot of practice time at home And this will not happen.</p> <p>5.1.28- Will teachers be required to work more than 8 hours a day-- Will they be paid overtime?</p> <p>5.6.16- Who do high schools on block scheduling receive a 90 minute planning time to plan for 3 classes and elementary teachers receive only 30 minutes to plan for 8-10 different classes?</p> <p>5.11.3- Elementary age students do not have the necessary critical thinking skills to accomplish this.</p>		
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ACTION TYPE
 N: No Response - Negative
 NA: Not Accepted + Positive
 A: Accepted O Neutral

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
 (Continued)

11/12/96 Essie McClann 5.1.18 Family and consumer sciences offers a positive image for our state. EXAMPLE - community volunteerism has been given nationwide coverage for the "hug-a-bear project" at one school. Also, it enhances student's self image. Teaches life skills.

11/12/96 Waverly Elementary 5.5 Who will provide reteaching and tutorial services while I continue to serve the rest of my class?
 Faculty Senate
 Waverly, WV 26184
 Deletion of 5.2.6.7 - Great!! Get rid of negative campaigns against our schools.

11/12/96 Glenda Follow 5.10.6 School counselors - More counselors will have to be hired if they are to spend 75% of their time with kids. Currently this is not possible.
 P0 Box 328
 Reader, WV 26167

11/12/96 Marilyn Cunningham-F.A.G.S. 5.1.25 Leave classes as electives. Important issues addressed by these classes which help students with self-esteem, relationships, successful working relationships.
 Box 480
 Clendenin, WV 25045

11/12/96 Carla Finharty 5.1.25 How do we control what is being heard in the home. The instructional day is already too long for the young children.
 P0 Box 328
 Reader, WV 26167
 Staff will provide parents with information about curriculum when asked.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
 (Continued)

11/12/96	Kay Blair Short Line School Box 328 Reader, WV 26167	5.1.11- We need more computers in classrooms, and a computer teacher at each school.		
		5.1.14- We need more money so teachers don't have to share.		
		5.1.15- No time in school day. This needs to be taken care of during summer school. Funded by the state.		
		5.1.17- There is no way to insure mastery for every child.		
		5.1.25- Need P.E. every day.		
		5.1.27- This value is taught at home.		
		5.1.28- The day is too long now. We have children on a bus at 6:00 and don't get home until 4:20. 15 mins. was added to our day in the '70's because of snow days. It was never taken off.		
		5.6.4- Present material when asked. Children must be responsible to get it home.		
		5.10.10- Eva. used now is better.		
		5.10.13- We have no time to do this.		
		5.10.14- From whom?		

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
 (Continued)

11/12/96	Joan Abergege Box 220 Reader, WV 26167	5. Time, teaching materials and teachers are necessary for reteaching and tutorial services. <u>Grouping</u> is a definite necessity and needs to be addressed.		
11/12/96	Brenda Nolan Short Line School Box 328 Reader, WV 26167	5.1.18- Reading the most important subject needs to Continue through 8th gr. at least. How can we influence a child who hears and sees harassment violence, racial conduct at home and in community?		
		5.1.14- Money needs to be provided for this.		
		5.1.15- Time needs to be provided and students have to come to it.		
		5.1.25- We need more Phy Ed teachers and students need Phys Ed daily to accomplish this.		
		5.1.27- So much of this is environmental, backgrounds, Attitudes are developed at home.		
		5.1.28- The day is already long enough when students are on the bus at 6:20 and don't return home until 4:20.		
		5.10.13- Where is the time? Is this an IEP for each student? More employment? Less time with students?		
		5.10.14- Who from? When?		
		5.11.3- The threat of corporal punishment is an effective preventive discipline program.		

ACTION TYPE
 N: No Response - Negative
 NA: Not Accepted P: Positive
 A: Accepted O: Neutral

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
 (Continued)

11/12/96	Charlene Canterbury Short Line School Box 328 Reader, WV 26167	5.1.14 Money needs to be provided for <u>all</u> students to have <u>all</u> materials. 5.1.15- Time needs to be provided. 5.1.25- Then more P.E. teachers need to be provided so every child must have P.E. every day. - Why is school responsible? 5.1.27- So much of this is environmental value system set at home. 5.1.28- Instructional day is long enough especially in counties that elementary schools run on high school schedules. 5.6.4- How are schools held accountable when parent's don't care? 5.6.23- If reading is not taught 7-12 then how can proficiency level is 50%. 5.10.10- Principals of large schools would not have time. 5.10.13- Where is the time? IEP for every student. 5.10.14- Who from? When?		
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ACTION TYPE
 N: No Response - Negative
 NA: Not Accepted + Positive
 A: Accepted O Neutral

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
 (Continued)

11/12/96	Gerald Mathias, Supt. 46 S. High St. Romney, WV 26757	5.1.18- "conduct dally or equivalent" 5.1.25- Eliminate - not attainable - No 2510 standard. 5.1.26- Delayed beyond 1997-98. Cover grades 9 to 12 not 11 to 12. 5.1.28- Allow waivers as needed due to travel times. 5.6.23- Eliminate 70%ile warranty. 5.7.2- Incorrect. All board members must receive 7 hrs. annually. 5.7.3- Incorrect. Every newly elected member must receive orientation. 5.9.5- Eliminate this requirement. What is leadership? 5.10.12- Eliminate.		
11/12/96	Connie Dakan Short Line School PO Box 328 Reader, WV 26167	5.1.14- How do we influence students who hear racial and sexual slurs from home? A lot of this is environmental. 5.1.14- More money needs to be provided for educational materials. State needs to fund summer school for remediation. What happens when you integrate all subjects? Science and social studies are not always taught daily. It isn't possible, unless the day is extended. We need more Physical Education teachers to enable all students to have PE everyday.		

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
 (Continued)

11/12/96 (Continued)
 Connie Dakan

5.1.38- Extend time for those schools who need it. The School day is long enough especially for schools that Run on the high school schedule. Entirely too long! Staff members provide parents with any information asked for, but how can we be accountable when they're not the least interested? How can students get to the 50% percentile when reading isn't taught in 9-12?

5.10.10- We presently set our own goals and go over them with the principals. We don't need principals back in rooms. Setting our own goals is usually more Efficient. There is no time to do IEP's for every student!

5.11.3- Corporal punishment is an effective preventive measure. Student's tell you that you can't touch them in 3rd grade.

11/12/96 Dixie Lee Holbert, Teacher
 Short Line School
 P O Box 328
 Reader, WV 26167

- More money needs to be provided for textbooks and materials.
- Don't scratch the fine art programs.
- Phy. Educ. Should be everyday to meet the 50% expected.
- How do we influence the student when the child hears racial slurs, sexual talk, etc. at home?
- The instructional day is already too long, because our buses run according to high school scheduling.
- The staff will furnish information to parents when asked.
- Require reading in the 7th and 8th grade, PLEASE!!
- 5.10.10 Does not follow current evaluation policy.
- Where is the time to write I.E.P.s. We don't want to have to write an I.E.P. for every student.
- Corporal punishment needs to be brought back.
- Unified School Improvement Plan won't work until state and federal will accept the same forms.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
 (Continued)

11/12/96	Charles Duffy/RESA VIII 109 S. College St Martinsburg, WV 25401	5.1.18- "taught daily" should be changed to: "taught Daily or equivalent" since the current wording eliminates block scheduling in middle/jr high schools.		
		5.1.25- What data do we have that suggest that 1/2 our Students can pass this test at this level? (Particularly since they will likely be getting less P.E.)		
		5.1.26- 1997-98 is too soon for those counties just getting started. Allow in grades 9-12 and begin in 1998-99.		
		5.1.28- Allow waiver for need travel time.		
		5.6.23- Eliminate 70% He warranty unless college systems issued the warranty.		
		5.7.2- Incorrect standard. All board members must receive 7 hrs. each year.		
		5.9.3- Incorrect standard. Every newly elected (not re-elected) board member must receive orientation.		
		5.10.12- Eliminate - This will cause schools to discourage students taking advanced placement tests.		

ACTION TYPE
 N: No Response - Negative
 NA: Not Accepted I: Positive
 A: Accepted O: Neutral

Date	Individual/Organization	Comments	Action/Type	Rationale
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**Section 5 - High Quality Standards
(Continued)**

11/12/96 Beverly S. Prince-Teacher
 Wirt High
 PO Box 219
 Elizabeth, WV 26143

5.1.11- Strike and change to supporting electives such as Child Dev., Parenting, Adult Roles, Consumer (finance) education, Driver's Edu., Wellness, Life Skills, Communications, service learning are offered.

5.1.18- Do not eliminate chances to students provided by clubs, activities and assemblies.

5.1.19- Add: supporting electives important to all career electives.

I would like to see these changes because families and individuals impact on work place, morale, and productively. Societal pressures families are increasing. I believe assuring success at home and on the job.

11/12/96 Alice R. Burgess
 Short Line School
 PO Box 328
 Reader, WV 26167

5.1.14- More money needs to be provided for textbooks and materials.

What about the fine arts program of study?

How do we influence the child that hears racial comments? We have zero tolerance, but how do we prevent this from happening?

The instructional day is already long enough when the elementary schedules coincide with a high school schedule.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
 (Continued)

11/12/96 (Continued)
 Alice R. Burgess

The staff members will provide information, but how can we be held accountable if the student will not take it home?

We must require Reading and Spelling for grades 1-12.

5.10.10- This does follow the current evaluation policy.

5.10.13- Where is the time? Does this mean each student will need an individual education plan?

5.11.3- We need the threat of corporal punishment.

11/12/96 Charlotte Norford
 Short Line School
 P0 Box 328
 Reader, WV 26167

5.14- Additional monies need to be provided by state for the additional materials.

5.1.25- If kids don't have P.E. every day how is it the school responsible for a kid's physical fitness?

5.1.28- Day is already long enough. K kids fall asleep at school and on bus on way home when school run on high school schedule.

5.6.4- Teachers will send info anytime asked for. How can we be held responsible for parents not asking?

5.6.22- If no reading 6-12, then how will poor readers ever get to 50th percentile?

5.10.10- Not follow current eval. Current eval. is fine as is. Additional day would be too much on principal.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 5 - High Quality Standards
 (Continued)

11/12/96 Charles Blair
 Short Line School
 Reader, WV 26167
 PO Box 328

What about the fine arts?
 5.1.28- The instructional day is long enough for
 elementary students.
 We need required reading and spelling everyday
 Grades 1-12.

5.10.10-Does not follow current evaluation policy.

5.10.13-Where is the time to do this?

5.11.3- Bring back corporal punishment.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 6 - County Annual Improvement Process

11/6/96 Anne Lathen
 218 Highland Avenue
 Oak Hill, WV 25901

6.5. On site review team . . . Review is necessary and helpful, however, if it becomes a documentation review too much time will be lost creating and maintaining plans, checklists, verification, etc. Teachers should be spending their time teaching, not documenting that they are meeting the expectations of a bureaucracy.

11/6/96 Lawronce Hitt, Principal
 Shepherdstown Elem. Sch.
 410 S. Church St.
 Shepherdstown, WV 25443

6.1. May we still use a waiver if a staff wants a different arrangement?
 6.2. Format to be used? Will these need to be reviewed County/school prior to Nov. 1, 1997? We are being totally consumed by paperwork and different improvement plans or something of this nature. We need help at the school level in dealing with this. It's hard to find time to observe teachers and deal with our students.

11/8/96 Betty Ann Williams
 Sherman Elem.
 PO Box 369
 Seth, WV 25181

Schools having an abundance of students need a principal, vice-principal, and counselor. This includes elem. schools. It should automatically include consolidated schools because they're actually 2 schools in one.

11/8/96 Beth Thompson
 Sherman Elementary
 Gen. Del.
 Gomfort, WV 25049

People from all levels of the school system need to be involved. (Parents, students, non-professional staff, professional staff, community members)

11/12/96 Janet Goodhand
 903 S. Washington St.
 Berkeley Springs, WV 25411

6.4. Intentional falsification.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
Section 6 - County Annual Improvement Process (Continued)				
11/12/96	Glenda Follow PO Box 328 Reader, WV 26167	All agencies need to accept the same form.		
11/12/96	Kay Blair Short Line School Box 328 Reader, WV 26167	6.1, 6.2 All agencies need to accept the same forms.		
11/12/96	Brenda Nolan Short Line School Box 328 Reader, WV 26167	6.1, 6.2 When all agencies accept the same forms there won't be a Unified School Improvement Plan.		
11/12/96	Charlene Canterbury Short Line School Box 328 Reader, WV 26167	6.1, 6.2 Until all agencies accept same forms, it won't work.		
11/12/96	Gerald Mathias, Supt. 46 S. High St. Romney, WV 26757	6.4 Intentional falsification.		
11/12/96	Alice R. Burgess Short Line School PO Box 328 Reader, WV 26167	6.1-6.2 Until all agencies will accept the same forms, it will not work.		

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 6 - County Annual Improvement Process
 (Continued)

11/12/96 Charlotte Norford
 Short Line School
 PO Box 328
 Reader, WV 26167

6.1-6.2- Until all agencies accept the same forms, this will not work. Double work on schools.

11/12/96 Charles Blair
 Short Line School
 PO Box 328
 Reader, WV 26167

6.1-6.2- A uniform form is needed for all agencies.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 7 - School Accreditation Status

11/8/96 Betty Ann Williams
 Sherman Elem.
 PO Box 369
 Seth, WV 25181
 Students should have daily access to library/educational technology. However, the county boards should maintain regular upkeep to ensure the technology is working.

11/12/96 Kay Blair
 Short Line School
 Box 328
 Reader, WV 26167
 7.3.1. Unfair process unless there are criteria or objectives met by each school. Not subjective, depending on the team at your school.

11/12/96 Joan Abernethy
 Box 220
 Reader, WV 26167
 It needs to be less subjective and more objective.

11/12/96 Brenda Nolan
 Short Line School
 Box 328
 Reader, WV 26167
 7.3.1. Is an unfair practice unless there is a defined measurable list of items to meet. It is too subjective.

11/12/96 Charlene Canterbury
 Short Line School
 Box 328
 Reader, WV 26167
 7.3.1. Unless all objectives are looked at the same way by every team, it is an unfair practices of evaluating schools.

11/12/96 Connie Dakan
 Short Line School
 PO Box 328
 Reader, WV 26167
 7.3.1. Depends on the team that reviews your school. There should be definite standard rules and objectives by every team. It is to subjective. It is unfair!

11/12/96 Dixie Lee Holbert, Teacher
 Short Line School
 PO Box 328
 Reader, WV 26167
 7.4.3. Unfair process.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 9 - County Approval

11/8/96 Betty Ann Williams
 Sherman Elem.
 P0 Box 369
 Selh, WV 25181

All schools - Elem., Jr. High, and High Schools need
counselors.

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

Date	Individual/Organization	Comments	Action/Type	Rationale
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Section 10 - On-Site Reviews

11/6/95 Lawrence Hill, Principal
 Shepherdstown Elem. Sch.
 410 S. Church St.
 Shepherdstown, WV 25443

We have been fortunate to have professional, understanding on-site teams. Keep up the good work with these.

OTHER COMMENTS

11/6/96

Anne Lathen
218 Highland Avenue
Oak Hill, WV 25901

Fiscal Note Worksheet shows no change in the financial expenditures to implement these changes. Where is the money coming from to have counselors available to help students write individual plans for a five year period? Where is the money to provide sustained intervention for at-risk students? Where is the money to acquire the technology that is to be a part of everyday and every topic? Where is the money for the people who are to supervise students while learning in the work place or to screen the employers so that parents are sure that their children will be safe in those workplaces?

11/8/96

Cris Boyd, WVSSPA
State Aide Rep. & Berkeley
Co. Aide Rep.
2002 Beacon Dr.
Martinsburg, WV 25401

I would like to address my concerns with Senate Bill 300 Policy 2510. On page 32 Section B, it states, "Kindergarten teachers have one aide if the class enrollment exceeds 10 students. If deemed appropriate by the Principal, up to fifty percent of the aide's time may be allocated for instructional assistance in grades 1 and 2." This will be effective in the Fall of 1997. In Berkeley County, our Kindergarten aides work with groups and individual students all day. Last June, many of us attended the Tri-County Institute where we took a class on implementing full-day Kindergarten. What we realized from this class was that most us already cover more in our 1/2 day program than is expected of us with a full-day program. Right now in my kindergarten class, our students have been introduced to 21 sight words and most have mastered them. Should the Kindergarten aides be pulled 50% of their time for 1st and 2nd grades, this success rate would not be probable and the success of the students jeopardized. Most of our students come to us without pre-school experience. So we start from scratch, many can't hold a pencil let alone write or identify their names. It takes the teacher and the aide working as a team weeks of constant work with each child to teach them basics. Without a full-time aide in Kindergarten, our present curriculum program will not succeed, which means these children will not be ready for 1st grade.

Goal 1 addressed in policy 2320 page 2, section 13-3A states "All Children Entering the 1st grade will be ready for 1st grade." How will this be achieved if you pull the kindergarten aides 50% of their time from the Kindergarten classroom. Another goal on page 3 section 4.5 states that "The Promotion Rate is at or Above 95% in K-8." Again, how can this goal be reached without a full time aide in kindergarten. The result of this policy will be a watered down program which will not provide the foundation needed for the students to succeed in later years.

Let me cite an example. Berkeley County schools get a number of kindergarten transfer students from Maryland daily. Many of these students are 4 years old, immature, and not ready socially for kindergarten. In most all cases, these transfer students are below the curriculum level of our slowest students. We feel that part of the reason these students are behind our students in curriculum level is because Maryland does not currently have Kindergarten aides and are unable to match the type of curriculum we currently have in Berkeley County. We have students from Maryland that come to us as late as December that still can't write their names. It takes a diligent effort of both the teacher and aide to bring these students to our curriculum level. By December, our students are bringing up computers on their own and working with the IBM "writing

to read program." We strongly feel that Berkeley County's outstanding Kindergarten program will suffer greatly without full time Kindergarten aides.

I have worked in the Special Education, Title I program, as a bus aid, and presently as a Kindergarten aide. I know from experience that the need for aides is there at every level. I feel that without a full-time Aide, our successful Kindergarten program will suffer greatly which means that the students suffer. This policy will result in higher retention rates in Kindergarten, 1st graders will be less prepared, and students will have less one-on-one attention. True, our goal should be to provide the most cost effective program available, but this should not come at the cost of our student's educational success or the ability to achieve their goals later in life. The inability to successfully teach our Kindergarten students jeopardizes their educational success in later years. Students that drop out of school in most cases become an additional cost to society later. As a concerned educator and a tax payer, I am asking that you rethink this policy. I invite you to visit one of our Kindergarten classrooms and observe the process in action.

We thank you for your time and consideration.

11/8/96 Teachers and Staff

Huff Consolidate School

Box E

Hanover, WV 24869

1. Who performs extra-curricular and co-curricular duties? Are these duties with or without pay? These could be extended and altering a job description after being hired. Teachers or any other person should not be subjected to an unlimited work day.
2. Use of technology outside school hours is a concern for us. Who will man the new equipment? Will we be required to perform under extra-curricular and co-curricular duty requirements and stay for the community or students an unlimited number of hours?
3. Responsibility for students at 90% to be in post secondary education or fully employed 1 year after graduation. This is responsibility without control. We have no control over the lives of students who leave the school system. This number is high and arbitrary in an uncertain economy. By saying this we set ourselves up for liability for something we cannot control. A group action lawsuit against a school system or state board come to mind.
4. People required to teach and monitor computer skills do not have to be educators is a concern.
We believe that training, not only to educate, but to deal with children, is and always will be necessary. Being an excellent technician with computers or other technology does not make one qualified to deal with children. What about interpersonal relationships between the mentor adult and child? What about learning style? What about role modeling? What about the child on a day to day basis.
We want caring, trained, professional educators to do these jobs. Provide them with more training in technology if necessary. Foresight and foreplanning are the keys.
5. Aides - Kindergarten aides used outside of K is a concern. We have a concern about where aides will be used. We feel that very young children need the eyes, hands, and guidance of two people in the classroom for safety and academic reasons.
6. We have a concern about the accelerated learning provisions.
 1. We agree that students who can perform at a higher level should be allowed to proceed. Appropriate, timely entrance assessment should be provided.
 2. We are concerned about the logistics, cost, and staffing to the services.

3. We are concerned about social and adjustment problems that arise with accelerated learning.

7. We are concerned that we are boxing ourselves in with standards and setting ourselves up for lawsuits. Standards are great! They should be high. But, sometimes we must watch what we do. Example: These may pose a problem together.
- Every child must be at grade level and be making passing grades.

and

- Promotion rate will be 95%.

Consider this. We believe all children can learn. We believe all children can do advanced skills. But all children do not learn or perform at the same rate. Each individual is created equal in rights, according to our belief and our constitution. But we stick our heads in the sand when we think that all people have the same ability, learning rate, and performance rate. There will be times we cannot achieve the above standards. Other factors interplay. Fluke years produce low achieving groups. These groups are often populated by high numbers of students from broken homes. Broken homes are often a direct result of poor economy. We could go on.

Due to the enormous volume of material which must be previewed in order to make a statement about S.R. 300. We would like to respectfully request an extension of the November 15 public hearing deadline. We need more opportunities for input, time to read and understand.

POLICY 2320: PERFORMANCE BASED ACCREDITATION SYSTEM

COMMENT LOG

November 12, 1996 - November 15, 1996

Date	Individual/Organization	Comments
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Section 1 - General

11/14/96	Ashford Rumble School HG 64 - Box 540 Ashford, WV 25009	The word performance is just another word for outcome based education! (Delete Performance Based) (Background) - Again (Outcome Based Education) Delete - A system that mares the quality of ed. Based on student/school performance.
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Date	Individual/Organization	Comments
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Section 2 - Purpose

11/14/96 Ashford-Rumble School
HC 64 - Box 540

Requirements too stringent!

Ashford, WV 25009

Nothing wrong with high standards but they must be reasonable and attainable!

11/14/96 Sherman High School
Seth, WV

Uniform statewide assessment program.
School attendance rates.

Boone Co. School System

Dropout rates.

Percent of students promoted to next grade.

Graduation rate.

Average class size.

Pupil-teacher ratio.

Number of split-grade classrooms.

Percent of graduates who enrolled in college.

Percent of graduates who enrolled in other post-secondary education.

Percent of graduates who are gainfully employed within one year of graduation.

Operating expenditures per pupil.

Percent of graduates who attain the minimum level of performance in the basic skills.

Percent of graduates who receive additional certification of their skills above the minimum foundation level of basic skills.

Date	Individual/Organization	Comments
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Section 3 - Responsibility

11/13/96 Jefferson Elem. Center
Faculty Senate
1103 Plum St.
Parkersburg, WV 26101

3.1a Who gets students for 1st grade if not ready when enter 1st grade?

11/14/96 Ashford-Rumble School
HG 64 - Box 540
Ashford, WV 25009

Goal 1 - Impossible!
Goal 3 - Not everyone can be average or above!

Goal 4 - 50% is too high to increase! Unreasonable - unattainable!
~~Delete these goals!~~

11/14/96 Janice Kasserman
New Martinsville School
20 E. Benjamin Drive
New Martinsville, WV 26155

3.1a What is "ready for first grade?" What happens if child is not ready?

11/14/96 Barbara Quinet
New Martinsville School
20 E. Benjamin Drive
New Martinsville, WV 26155

3.1a What is "ready for first grade?" What happens if child is not ready?

11/14/96 Sherman High School
Seth, WV
Boone County Sch. System

Goal 1. All first graders ready for school.
Goal 2. All students have equal education opportunity.
Goal 3. Students performance on standardized tests to equal or exceed the 50th percentile.
Goal 4. 90% of ninth graders will graduate from high school.
Goal 5. The number of high school graduates will increase by 50%. All graduates will be prepared for college, post-secondary education or gainful employment.

11/15/96 Mike Burke
Mineral Co. Bd. of Ed.
1 Baker Place
Keyser, WV 26726

3.1.e...Improve by 50%
3.1.e...goal has no meaning.

Date	Individual/Organization	Comments
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Section 4 - Annual Performance Measures

11/13/96 Jill Brown
PO Box 328
Reader, WV 26167

As long as percentiles are used, one child must fall at each percentile.

There should be no exemptions of pupil teacher ratio at any level. A kindergarten should not have more than 18 students.

A minimum dollar amount should be placed for student expenditures.

11/13/96 Rebecca Gilkerson
318 Ohio Avenue
Rainelle, WV 25962

Do you promote regardless of the student's abilities, just to meet the 95% rate? Please rethink! It's also not fair to punish schools for not meeting these standards.

11/13/96 Pat Conway, Principal
Sylvester Elementary
PO Box 610
Sylvester, WV 25193

4.1 I believe that there should be a realistic expectation on standardized testing--everyone is not blessed with the same talents.

I believe that the promotion rate should remain at 92%. Students should be retained if they have not mastered the content area for the grade level.

11/13/96 Susanna Villers
Wetzel County Schools
333 Foundry Street
New Martinsville, WV
26155

4.2 Student Attendance Rate - It is extremely important that students maintain a high attendance rate. However, current state policies prohibit counties from developing effective policies. Either policy restrictions need to be lifted or the state needs to adopt a stringent attendance policy in order to be able to meet the increased standard. For example, South Carolina has a state attendance policy which requires students to miss ten or less days of school in order to receive course credit. Another example is Holton Rd. of Ed. (Michigan). Students are required to make up missed days after the third absence. Failure to make up days results in a letter grade cut per absence not made up. The policy was tested and upheld in court stating that "the policy related to a legitimate purpose". ("principal" March 1993) Again, I am not questioning the higher standard, but the fact that we have no leverage to implement a policy that will assist counties in meeting it.

11/13/96 Coal City Elementary
Faculty Senate
Drawer Y

4.1 50% of students in grades 3-11 perform at or above the 3rd quartile in total basic skills. This goes against the norms of the test.

Coal City Elem. School
Coal City, WV 25823

4.2 Attendance rate will rise from 90% to 93% by the year 2000. This is an extreme increase considering W. Va. weather, communicable illnesses, and student/parents not interested in schools.

Date	Individual/Organization	Comments
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Section 4 - Annual Performance Measures
(Continued)

11/13/96	Jefferson Elem. Center Faculty Senate 1103 Pham St. Parkersburg, WV 26101	4.7 No class should exceed 25 (no exceptions) as large # impede instruction.
11/13/96	Robert L. Dillon, III 807 Greenbrier Avenue Ronceverte, WV 24970	4.1 It is a worthy goal to have 90% or above of all graduates enrolled in college or fully employed by 2001, but there is no guarantee when dealing with people. To firmly state this will happen is unrealistic.
11/14/96	Ashford Rumble Elem. Sch. HG 64 Box 540 Ashford, WV 25009	4.1 The standards are set to high. Expectations need to be raised, but to attainable goals. 4.5 Promotion rate is too high with the higher standards. Unrealistic expectations if you want to reduce the dropout rate. 4.7 Allow no exemptions in grades K-6: 25 maximum.
11/14/96	Sherman High School Soth, WV Boone Co. School System	<p>1. This goal would indicate that at least half of the population in grades 3-11 within a county, would be expected to perform at or above the 75th percentile on our annual basic skills tests. This is a laudable goal, however, it is unrealistic without appropriate funding from the state to supplement already existing remediation plans within the counties. Additional teachers, and new technology are needed to reach these goals.</p> <p>2. Student attendance rate at or above the 90.5% level is to be strived for. However without funding to enable counties to offer relevant classes that incorporate new technologies, it is unlikely that we can reach the 50% of students who are in a general track going no where. Money and smaller classes, a psychologist for each school, counselors for each grade level and appropriate curriculum that addresses the level that each individual child is functioning on, are needed before these goals can be met.</p> <p>3. The above measures would also decrease our dropout rates. This would enable West Virginia to employ West Virginians. Also, as long as county funding is based upon student body count, we will continue to enroll students who have no intentions of attending school, or studying when they are there. These students impede the progress of serious students. A more reliable source of funding needs to be implemented so that we can deliver the best quality service to those students who attend regularly and seriously want to prepare for their futures. Once again, money and smaller classes, a psychologist for each school, counselors for each grade level and appropriate curriculum that addresses the level that each individual child is functioning on, are needed before these goals can be met.</p>

Date	Individual/Organization	Comments
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Section 4 - Annual Performance Measures
(Continued)

11/14/96
(Continued)
Sherman High School
Seth, WV

4. As long as the state offers students a driver's license if they stay in school, but does not tie this privilege to a standard of curriculum excellence, we will continue to have students who do not graduate, or graduate with very low basic skills.
5. The above students need to be offered remediation programs, access to new vocational programs that do not require a two hours a day journey, real opportunities to access employment or post-secondary education, and technology that gives our students the ability to compete with other students in other states.
6. Reachable goal.
7. Reachable goal.
8. The 50% level of basic skills is a comparative figure that indicates that West Virginia students are over all above average in intelligence. Nothing has ever indicated this statistically. How do we address the real needs of our students using false and inflated goals that are not attainable?
9. Reachable goal.

11/14/96
Kevin Boggs, President
WVEA
1558 Quarrier St.
Charleston, WV 25311

- 4.1 Does placing such a high priority on the performance measures accurately reflect the quality of education delivered at a school? Test scores, graduation and attendance are all factored outside the school's scope of authority and control.
- 4.1 With the switch to a new norm referenced test and no idea at what percentile our students will perform, we trust the percentages will be reviewed and if needed revised after testing data of the new assessment are available.
- 4.3 WVEA likes the new formulas for calculation of the dropout rates and graduation rates.
- 4.5 Requiring mastery of basics may not enable a 95% promotion rate. Administrators will force teachers to promote students to achieve the 95% rate.
- 4.7 The three students in grades 4-6 over 25 are granted by statute. Exemptions do not have to be requested but are built into the statute.
- 4.10 Will the per-pupil allocation be published and updated as an information item to the public?

Date	Individual/Organization	Comments
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Section 4 - Annual Performance Measures
(Continued)

11/14/96 (Continued)
Kevin Boggs, President
WVEA 4.11 The indicator will be extremely difficult for schools to track. Does a non-reply count as a "no"? This requirement simply adds work to an already overworked staff. Tracking a small vocational education population simply cannot be translated to the entire school population.

4.14- Are these realistic goals? This should be reassessed after new testing data is available.

4.15

4.16 No criteria or definition is clear on what these items are.

11/14/96 John McClure 4.1 It would be clearer to use the 50th percentile rather than the 3rd quartile.
1500 Bridge Road, Apt. 505

Charleston, WV 25313 4.14 Has anyone determined how many more items a student will have to get correct to move from the 40th percentile (West Virginia) to the 50th percentile (national)?

11/14/96 S. Hetzel 4.1 This is confusing! Does this address grade level percentiles or total school percentiles?
Jefferson County Schools

RESA VIII comments 4.3 This is a better method but calculate on 7-12 enrollment statewide. This brings equality to calculations
(Group discussion and for all secondary schools.
agreement on these)

4.4 Lower graduation rate to 83%.

4.5 Promotion rate should remain at 92%.

4.11 Eliminate until more data on these standards is collected over at least 2 years.

4.14 Eliminate this item. This is a higher standard than expected in 4.1.

4.15 Eliminate this item.

4.16 Clarify this item.

11/14/96 Dr. Nancy Kilmon 4.1 This is confusing! Does this address grade level percentiles or total school percentiles?
Berkeley County Schools

401 S. Queen St. 4.3 This is a better method but calculate on 7-12 enrollment statewide. This brings equality
Martinsburg, WV 25401 to calculations for all secondary schools.

Date	Individual/Organization	Comments
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Section 4 - Annual Performance Measures
(Continued)

11/14/96	And	4.4 Lower graduation rate to 83%.
11/14/96	Hudgins (Grant Co. Schs) 204 Jefferson Ave. Petersburg, WV 26847	4.5 Promotion rate should remain at 92%. 4.11 Eliminate until more data on these standards is collected over at least 2 years. 4.14 Eliminate this item. This is a higher standard than expected in 4.1. 4.15 Eliminate this item. 4.16 Clarify this item.
11/14/96	Michael W. Kessinger Principal Tucker Valley El./Middle Sch. Hambleton, WV 26269	4.11 Are schools going to be held accountable for the economic situation of the area in which they are located? The schools have no control over this. 4.14 This should be 50%.
11/14/96	Rose T. Kessinger PO Box 161 Parsons, WV 26287	4.5 In conflict with "time as the variable" 4.11 Schools have no control over the economy which employs people. 4.14 Statistical impossibility.
11/14/96	Brenda E. Smith, Teacher PO Box 267 Masonstown, WV 26542	4.5 Promotion Rate - I strongly question the feasibility of this promotion rate allowing for the inevitable remediation necessities.
11/14/96	Flatwoods Elem. School PO Box 130 Flatwoods, WV 26621	When student performance exceeds the national average, the norms will be raised and your purpose will be defeated.
11/14/96	Faculty Senate Summersville Jr. High 40 Grizzly Rd. Summersville, WV 26651	Where do your %'s come from? You arbitrarily change something from 17% to 6% -- from 90% to a series of % -- 90.5%, 92.5%, etc. What do we do to improve the drop-out rate? There you go again. We have a max. On class size for K-6 but not on secondary. How do you address 36 students in an Algebra II class? Is this a good situation?

Date	Individual/Organization	Comments
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Section 4 - Annual Performance Measures
(Continued)

11/14/96	Brad Kite 210 North Main St. Petersburg, WV 26847	4.5 The quota system in education is equivalent to a Kentucky race horse giving an in-concert at the Kennedy Center entitled OPUS IN THE MEGH MAJOR. This is definitely a <u>na</u> y proposal.
11/14/96	WV Advisory Council for the Education of Exceptional Children 100 Angue E. Peyton Drive South Charleston, WV 25303	Since this policy reflects the measuring of the content of Policy 2510 the Council supports accountability and monitoring of standards of quality. We would refer to the 1996 Annual Report regarding the development of a proactive technical assistance focused monitoring system.
11/14/96	Marsha Diano Michael 4 Lee Street Petersburg, WV 26847	4.5 Raising standards should be enough - why also put a quota on promotion?
11/14/96	Margaret Lancaster Short Line School Box 328 Reader, WV 26167	4.3 In doing percentiles one child must fall at each percentile. 4.6 Should never have exemptions at any grade level on pupil-teacher ratio. 4.10 A set dollar amount should go to all schools.
11/14/96	Mark Carl Fawcett Network Administrator Magnolia High School 601 Maple Ave. New Martinsville, WV 26155	4.11 School has no control over job markets. 4.13 How can you measure if a parent is satisfied? 4.1 Testing - Too much time is taken out of the school year for testing (Stanford, Stanford pretest, Life Skills, SAT, PSAT, Vocational, Physical Fitness, IEP, P.L.A.N., etc.). Where is the time for consistent, consecutive teaching? Also, the 50% percentile is unrealistic. This is not Lake Wobegon where all the children are above average.

Date	Individual/Organization	Comments
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Section 4 - Annual Performance Measures
(Continued)

11/14/96	Mark Carl Fawcett Network Administrator 601 Maple Ave. New Martinsville, WV 26155	4.3 93% attendance - If the state is going to require 93% attendance, they should formulate an attendance policy with strength to support the counties, and not unmake efforts by counties to do good attendance policies. 4.9 95% promotion rate - Promotion should be competency based, not percentage based, based on mastery, not head count.
11/14/96	Sam Snider Short Line School Box 328 Reader, WV 26167	4.10 Attendance based expenditures - Once again, develop a meaningful attendance policy to help the counties. Percentiles show children at all levels. No exemptions at any level. % tage & % lles don't mean the same hard to combine or match. If 70% lle used 29% lle should be used not 33% lle.
11/14/96	Janice Kable Instructional Specialist Jefferson County Schools P0 Box 987 Charles Town, WV 25414	4.1 This is confusing! Does this address grade level percentiles or total school percentiles? Eliminate it. 4.3 This is a better method but calculate on 7-12 enrollment statewide. This brings equality to calculations for all secondary schools. 4.4 Lower graduation rate to 83% . Actually, don't need 4. 3 and 4.4. 4.5 Defeats concept of "Time is the Variable." Promotion rate should remain at 92%.
11/14/96	Jennifer Bates Short Line School PO Box 328 Reader, WV 26167	4.11 Eliminate until more data on these standards is collected over at least 2 years. 4.14 Eliminate this item. This is a higher standard then expected in 4.1. 4.15 Eliminate this item. 4.16 Clarify this item.

As long as percentiles are used, one child must fall at each percentile. (This is ridiculous)
 There should not be exemptions regardless of grade. Kindergarten classes should have no more than 18.
 There should be a minimum set amount for pupil expenditures.

Date	Individual/Organization	Comments
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Section 4 - Annual Performance Measures
(Continued)

11/14/96	Kathy J. D'Antoni, WVDE School to Work Implementation Counties (Mason, Mercer, Wayne, Wyoming and Gilmer)	4.3 Provisions for waivers of this standard should be considered as systems implant and issue standards data indicates that dropout rates do increase for about 3 years when systems begin the process of raising standards. 4.5 Promotion rates are in conflict with the concept of mastery. This standard could encourage systems to advance students without skills in order to be in compliance. More discussion needs to take place on this standard. 4.11 These percentages should be increased to 90% and 95% with some allowances for those unavailable to attend college or participate in work. Ex. Raising a family, health restrictions, etc.
11/14/96	Gail Sherman Jefferson County Schools 110 Mordington Avenue Charles Town, WV 25414	4.1 This is confusing! Does this address grade level percentiles or total school percentiles? 4.3 This is a better method but calculate on 7-12 enrollment statewide. This brings equality to calculations for all secondary schools. 4.4 Lower graduation rate to 83%. 4.5 Promotion rate should remain at 92%. What about special education and our own Half-Steps students who may need longer (the gift of time)? 4.11 Eliminate until more data on these standards is collected over at least 2 years. 4.12 Remove! 4.14 Eliminate this item. This is a higher standard than expected in 4.1. 4.15 Eliminate this item. 4.16 Clarify this item.
11/14/96	Musselman Middle Sch. Faculty Senate Rt. 2, Box 119 Bunker Hill, WV 25413	4.1 50% of students at or above 3rd quartile in basic skills is unrealistic. 4.2 Parent involvement at 60% - how measured?
11/14/96	Ashford-Rumble School HG 64-Box 540 Ashtford, WV 25009	4.1 Standards are too high/unreasonable/unattainable. (Revise or delete this standard.) 4.2 Attendance - 85% may be attainable! Standards too high as proposed (Revise or delete standard)

Date	Individual/Organization	Comments
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Section 4 - Annual Performance Measures
(Continued)

11/14/96	(Continued) Ashford-Rumble School Ashford, WV 25009	4.5 Promotions - 95% promotion rate is too high! This promotes social promotions! 90% may be reasonable/attainable! (Revise this standard)
11/14/96	Linda Fanner New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	4.6 (2.1.25?) Choral and Instrumental Music - Leave this in as a standard! Do not eliminate! If we take it out it will eliminate these programs for grades 5 & 6!
11/14/96	Carolyn Zepukar 61 Orchard Drive New Martinsville, WV 26155	4.7 Pupil/Teacher Ratio - Allow no exemptions in grades K-6! 25 maximum! Also no exemptions for split-grade classrooms.
11/14/96	Linda Fanner New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	4.11 Graduates in college/post-secondary ed./etc. - 85% is too high! Unreasonable! 75% may be attainable! (Revise or delete standard)
11/14/96	Carolyn Zepukar 61 Orchard Drive New Martinsville, WV 26155	4.12 Parental Involvement - 60% is too high/unreasonable! Also an increase each year is impossible! Sooner or later you will have a decrease! Schools simply need to document parental involvement! Standards too high! (Delete or revise this standard)
11/14/96	Carolyn Zepukar 61 Orchard Drive New Martinsville, WV 26155	4.13 Parent/Teacher/Staff/Student Satisfaction Rate - 75% is too high! Unattainable! 60% may be attainable! (Delete or revise this standard)
11/14/96	Carolyn Zepukar 61 Orchard Drive New Martinsville, WV 26155	4.15 Warranty Level/Graduates - Eliminate warranties altogether! (Delete or revise this standard)
11/14/96	Linda Fanner New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	4.7 Pupil-Teacher Ratio - Do not make exemptions to the pupil-teacher ratio on grades K, 4-6. It is detrimental to classroom learning and behaviors.

Date	Individual/Organization	Comments
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Section 4 - Annual Performance Measures
(Continued)

11/14/96	Barbara Quinet New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	4.2, 4.3, 4.4 Percentages do not take into account individual or county differences. Do we keep disruptive students in school at the expense of "average" children. 4.4 Does not take into account individual differences. 4.5
11/14/96	Pat Wildman 655 James St. New Martinsville, WV 26155	4.14.3 Is this necessary? If a school is doing its job, this is a needless statistic. Consideration must be given for individual differences.
11/14/96	Greg Richmond New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	4.1 Mathematically impossible. 4.2, 4.3, & 4.4 Does not take into account individual or county differences. Do we keep disruptive students in school at the expense of "average" students?
11/14/96	Jo Kirk New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	4.1 How can these percentages be justified? 4.13 Allowance for literacy, involvement tests. How will this trend be measured? 4.14 This could vary at any given time during the school year.
11/14/96	Kim Underwood New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	Allowance for literacy involvement. Measured how? Could vary at any given time during the school year.
11/14/96	Patricia J. Bills 821 1/2 5th St. New Martinsville, WV 26155	4.13 If we are giving allowance for literacy? How will this be measured? How can these percentages be justified? 4.3 Time will be variable at a given time during the year.
11/14/96	Stephen Rogaski New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	Percent do not take into account individuals or county differences. Do we keep disruptive students in school at the expense of other students.

Date	Individual/Organization	Comments
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Section 4 - Annual Performance Measures
(Continued)

11/14/96	Gindy Riley 20 E. Benjamin Drive New Martinsville, WV 26155	Allowances for literacy, involvement. How will this be measured. How can these % be measured. This would vary at any given time during the school year.
11/14/96	Patriela Sullivan New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	<p>4.1 How can these percentages be justified?</p> <p>4.13 Allowance for literacy, involvement, etc.? How will this trend be measured?</p> <p>4.14 This could vary at any given time during the school year.</p>
11/14/96	Janice Kasserman New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	<p>4.2 Percentages do not take into account individuals or county differences. Do we keep disruptive students in school at the expense of "average" children?</p> <p>4.5 Does not take into account individual differences.</p> <p>4.14 Is this necessary? If a school is doing its job, this is a needless statistic.</p>
11/14/96	Sherman High School Selh, WV Boone Co. School System	<p>Student achievement, attendance, and dropout data are reviewed annually to determine the accreditation status of schools. The remaining performance measures may be reviewed annually or randomly by on-site review teams.</p> <ol style="list-style-type: none"> 1. A minimum of 50% of the school's students in grades 3-11 perform at or above the third quartile in basic skills. No more than 15% of the students may perform within the 1st quartile. 2. Student attendance rate is at or above the 90.5% for the 1997-98 school year; 91.5% for the 1998-99 school year; 92.5% for the 1999-2000 school year; 93% for the 2000-01 school year. 3. The maximum student dropout rate is six percent. 4. By the year 2000, the graduation rate is at or above 90% (based on 9th grade enrollment and adjusted for migration). 5. The percentage of graduates enrolled in college, enrolled in post-secondary education or fully employed within one year of graduation is 85% or above for the year 2000 graduates and 90% or above for each subsequent school year. 6. The level of parent involvement shows an increasing trend and is at or above the 60% level. 7. The average combined satisfaction with school 75%. 8. The percentage of graduates attaining the minimum level of performance (50%) in basic skills is above 60%. 9. The percentage of graduates attaining the warranty level for post-secondary education (70% percentile) is above 33%.

Date Individual/Organization

Comments

Section 4 - Annual Performance Measures
(Continued)

11/14/96	Linda Fonner New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	4.7	Pupil/Teacher Ratio - Do not make exemptions to the pupil-teacher ratio on grades K, 4-6. It is detrimental to classroom learning and behaviors.
11/15/96	Jane Kitzmiller Mineral County Schools One Baker Place Keyser, WV 26726	4.1	This is confusing! Does this address grade level percentiles or total school percentiles?
		4.3	This is a better method but calculate on 7-12 enrollment statewide. This brings equality to calculations for all secondary schools.
		4.4	Lower graduation rate to 83%.
		4.5	Promotion rate should remain at 92%.
		4.11	Eliminate until more data on these standards is collected over at least 2 years.
		4.14	Eliminate this item. This is a higher standard than expected in 4.1.
		4.15	Eliminate this item.
		4.16	Clarify this item.
11/15/96	Mike Burke Mineral Co. Bd. Of Ed. 1 Baker Place Keyser, WV 26726	4.1	Complicated/2 ways to fall = Stay with 50% AND make some exception for small small schools where small numbers impact percentiles.
11/15/96	Dr. Barbara J Fassig Ohio County Schools 2203 National Road Wheeling, WV 26003		The percentiles required for student performance levels concerning basic skills may need revised. The basis for selecting the specific percentages of students to perform at a specific percentile is not clear, but rather appears to be arbitrarily selected (4.1, 4.14, 4.15). The high percentages could realistically place many schools at risk if not at failure to meet the performance levels. If all schools in the state can achieve having 50% of the students achieve at or above the 50th percentile, that alone would be a great accomplishment.

Date	Individual/Organization	Comments
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Section 4 - Annual Performance Measures
(Continued)

11/15/96 (Continued)
Dr. Barbara J. Fassig
Ohio County Schools

4.1 This would call for only 35% of the school's students to perform within the 2nd quartile. If a minimum of 50% of the school's students perform at or above the 3rd quartile, then it seems reasonable to not place percentages in either the 1st or 2nd quartile, but to merely state that no more than 50% of the school's students perform at or below the 2nd quartile. It would be possible for a school to have 85% of the students at or above the 3rd quartile and still have 15% in the 1st quartile. Thus, not meeting the performance level required. This also does not address the students who consistently score in the bottom quartile. The same students could be there all through school. Instead of a percentage in the bottom quartile, it might be better to address the importance of moving individual students from that quartile.

11/15/96 Deb Gutshall

4.1 Those who can go onto college are limited in our area because of lack of parental interest and support, money and fear of moving to a larger unsafe area. We cannot control these.

4.1 Unrealistic. Throw out that lower quartile percentage.

4.2 Attendance too high. One bus not running could be detrimental.

4.5 Do not promote any until they are ready.

4.11 We cannot control if they want to work or if they have transportation.

4.12 Good.

4.13 Not good to base it on one survey per year.

4.15 Warranty cannot be based on just one test annually.

11/15/96 Keith A. Herrick
Magnolia High School
601 Maple Avenue
New Martinsville, WV 26155,

4.1 Testing - Too much time is taken out of the school year for testing (Stanford, Stanford pretest, Life Skills, SAT, PSAT, Vocational, Physical Fitness, IFP, P.L.A.N., etc.). Where is the time for consistent, consecutive teaching? Also, the 50% percentile is unrealistic. This is not Lake Wobegon where all the children are above average.

4.3 93% attendance - If the state is going to require 93% attendance, they should formulate an attendance policy with strength to support the counties, and not undermine efforts by counties to enforce good attendance policies.

E.M. Miller
Magnolia High School
714 N. Main St.
New Martinsville, WV 26155,

4.9 95% promotion rate- Promotion should be competency based, not percentage based, based on mastery, not head count.

Date	Individual/Organization	Comments
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Section 4 - Annual Performance Measures
(Continued)

11/15/96	Rebecca J. Moore 12 South 1st Avenue Paden City, WV 26159	4.10 Attendance based expenditures - Once again, develop a meaningful attendance policy to help the counties.
11/15/96	Darrell A. Ballard Magnolia High School	
11/15/96	Judith Pyles 1734 Rolling Hills Circle Charleston, WV 25314	This is a positive change - emphasize attendance and achievement.
11/15/96	Nancy Gibson Herbert Hoover High School PO Box 10104 Charleston, WV 25357	4.5 Remediation will slow the increased proposed promotion rate.
11/15/96	Brenda Smith Preston High School 400 Preston Drive Kingwood, WV 26537	4.5 Promotion rate - Promotion rate will not be possible if effective remediation is carried out.
11/15/96	Dr. Richard Adkins, Ex. Dir. Boone County Schools 69 Avenue B Madison, WV 25130	4.2 Attendance - 85% may be attainable standards too high as proposed. Revise or delete standards! 4.5 Promotions - 95% promotion rate is too high! This promotes social promotion! 90% may be reasonable/attainable! Revise this standard!
11/15/96	Dr. Barbara J. Fassig 2202 National Road Wheeling, WV 26003	4.14 To have sixty percent of the students attain a minimum level of performance at the 50th percentile is high. It would seem to be more realistic to expect that 50% of the students perform at the 50th percentile. This percentage would then also agree with 4.1. Students that do not perform at the 50th percentile are usually those that drop out. Students scoring below the 50th percentile need to be encouraged to stay in school and to be helped. A percentage lower than 60% of the students may help to keep more students in school even if they don't reach the 50th percentile.

Section 4 - Annual Performance Measures
(Continued)

11/15/96 (Continued) 4.15 At the 70th percentile, it would be expected that in a class of 400 students, 132 students perform at the 70 percentile in each area. High expectations are really needed, but the 70% percentile may be too high for many schools and many students. Students can still be prepared, achieve A's and not necessarily score at the 70th percentile on a norm-referenced test.

Dr. Barbara Passig
Ohio County Schools

Performance data can be analyzed prior to the start of the school term and certainly should be, but only if the data is received at a responsible time. If data is received at the end of May, staff may not be available to do the analysis.

11/15/96 Suzy Shirkey
Ashford Rumble
HG 64 Box 540
Ashford, WV 25009

Standards are too high. It will be almost impossible to be accredited. The old standards were a challenge to achieve. Higher standards to assess performance will bring failure. Accountability is for improving programs that are reasonable.

Continuing to add more objectives and goals does not mean effective teaching and learning. We teach all students. It is hard for everyone to be at the 50th percentile.

I have concerns about who and how schools and students will be assessed only on an outcome basis is not a true assessment. The proposed plan will only bring more paper work resulting in less teacher planning, teaching, and evaluating time.

Since most schools have not achieved full accreditation on the old standards, raising them will only cause more failure. Revise these to be reasonable.

Most schools will go on probation if proposed standards go in effect. I don't feel 1 year is enough time to turn around a school labeled "seriously impaired."

Again, standards proposed are not realistic. Many counties will be labeled with negative feelings resulting about our public school system.

11/15/96 Pamela White
Ashford Rumble Elementary
HG 64, Box 540
Ashford, WV 25009

- 4.1 Standards are too high/unreasonable/unattainable
- 4.2 85% may be attainable - standards too high
- 4.5 95% promotion rate is too high, this promotes social promotion/90% may be reasonable
- 4.7 Allow no exemptions in grades K-6 25 maximum also no exemptions for split-grade classrooms
- 4.11 85% too high - increase each yr. impossible sooner or later you will have a decrease

Date	Individual/Organization	Comments
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Section 4 - Annual Performance Measures
(Continued)

1/1/15/196	Amy White HC 81, Box 7A Peytona, WV 25154	4.1 standards are too high. 4.5 Promotion rate is too high and needs to be revised. 4.7 Exemptions should be eliminated in gr. K-6.
1/1/15/196	Nancy L. Justice, Teacher Ashford-Runtle Elem. HC 64, Box 540 Ashford, WV 25009	4.12 60% Parental involvement is too high. Too many work and makes 60% impossible. 4.1 Standards too high 4.2 Standards too high 4.5 Promotions - Rate is too high 4.7 Pupil-teacher ratio 4.11 Revise or delete - too high 4.12 Parental Involvement - too high - Document Parental Involvement

Date	Individual/Organization	Comments
11/13/96	Jill Brown P O Box 328 Reader, WV 26167	<p>Section 5 - High Quality Standards</p> <p>How do we influence racial, sexual, religious/ethnic comments that the students hear daily at home.</p> <p>Instructional days are already long enough especially for those counties that the elementary schools run on a high school bus schedule.</p> <p>Staff members will provide parents with information when they are asked.</p>
11/13/96	Lesla Spears (Family & Consumer Science) 423 Ewart Avenue Beekley, WV 25801	<p>5.1.18 Research in working with middle school student (grades 5-8) shows that hands-on activities are the most effective teaching techniques. This section leaves out all Vocational Educational Programs including Family & Consumer Sciences and Tech. Ed. Both of these programs already have career Exploration built into their curriculums. This section is leaving out a valuable learning tool for grades 5-8.</p> <p>5.1.19 For grades 9-12 it is imperative that students be allowed the opportunity to participate in classes that focus on the family and life skills. Students should not be sent out into the world without skills for life, like parenting, diet management, budgeting, planning, and leadership. ALL SKILLS TAUGHT IN FAMILY & CONSUMER COURSES. Each of these processes involve critical & creative thinking, and make learning more meaningful to students. DO NOT eliminate STEPS, PARENTING, & ADULT ROLES from this list. Students will be missing out on wonderful programs that prepare them for LIFE. The job you choose is only 1/2 of the picture. How will you live outside the job place?</p> <p>5.1.21 This section reads like Driver's Education is the ONLY elective to be offered. This be an oversight.</p> <p>5.1.22 STEPS/BASH are courses already in place in the secondary system, that have career education as a focus in each unit. Leaving these programs as part of the total curriculum package will eliminate having to set-up new careers programs.</p> <p>5.1.25 This section of the policy seems to indicate that the only important area of a students elective life is the awarding of the Presidential Fitness Badge. As a student I was unable to pass this test. However, I went on to graduate magna cum laude from West Virginia University and 33 in a class of 465 from Woodrow Wilson High School. As an adult I run/walk over 20 miles per week and so far have avoided major adult illnesses, and to lead a healthy lifestyle. I obtained these skills from Consumer and Homemaking Programs. If these programs are eliminated from the curriculum you are taking away 1/2 of a students opportunity to learn about leading a healthy life. Which skills have you used most in life-being able to hang from a chin-up bar for 30 seconds or being able to plan and prepare a healthy diet? I truly believe that we'll do a better job preparing our students for the future if we present a balanced program-- Exercise/health/skills for life.</p> <p>5.1.26 Vocational Education has always provided students with the opportunity to see "real work situations!" Programs at the middle school level have a job shadowing and volunteerism as components of their curriculums.</p>

Date	Individual/Organization	Comments
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Section 5 - High Quality Standards
(Continued)

11/13/96	(Continued) Lisa Spears	5.6.8 This section lends itself to the fact that at the Middle School level especially, VOCATIONAL Programs are ONE of the BEST INSTRUCTIONAL PRACTICES going. Administrators and teachers who read RESEARCH know that "hands-on" learning is the most effective teaching technique for grades 5-8. We are also very adaptable to team teaching practices.
5.10.6		In order for school counselors to spend 75% of time in ACTUAL counseling, scheduling of students MUST be done through another source. Guidance at our school spends an inordinate amount of time on setting up schedules and changing schedules, and dealing with paperwork that could perhaps be done through clerical channels.
5.10.9		Often Administrators are not familiar with new and updated ways of creating lesson plans. This policy section seems to infringe upon individual teacher styles. Just because something is written on paper does not mean it's happening in the classroom.
5.10.14		This section does not go into enough detail about consequences for disruptive behaviors. When will students be held accountable? We as a system are much too tolerant of disrespect and non-working students.
11/13/96	Rebecca Gilkerson 318 Ohio Avenue Rainelle, WV 25962	Policy 2418 (alternative schools) <u>rewards</u> bad kids, punishes good. Who doesn't want to lie in bed all morning?
11/13/96	Pat Conaway, Principal Sylvester Elementary PO Box 610 Sylvester, WV 25193	5.1.15 This standard is excellent in theory--however where is the money going to come from for implementation.
11/13/96	James Marshall Rt. 3, Box 90 Ripley, WV 25271	5.10.6 Define whether direct contact with students is required. Is documentation of time required? Define individual or group counseling, developmental guidance, academic planning and career counseling. Assisting students is sometimes defined liberally to include activities such as developing master schedules, running report cards, copying records, coordinating certain activities, etc.

Date Individual/Organization

Comments

Section 5 - High Quality Standards
(Continued)

Date	Individual/Organization		Comments
11/13/96	Goal City Elementary Faculty Senate Drawer Y Goal City Elem. School Goal City, WV 25823	5.10.6	School counselors spend at least 75% of their time assisting students through Individual or Group counseling, developmental guidance, academic planning. All school counselors are at all schools every day. By the time they do other work required by law, they don't have time to spend 75% of their time counseling or teaching developmental guidance. Health services are provided to all students to maximize learning potential. We have an inadequate number of health professionals working in our county to achieve this.
11/13/96	Sharyn Urey 1st Grade Teacher 307 Morgantown St. Apt. 4 Kingwood, WV 26537	5.1.25 5.1.28	I don't understand how it will be possible for 50% of K-2 students to pass the Presidents Physical Test when Phys. Ed. Is one of the subjects being de-emphasized in Policy 2510. These 2 policies seem to contradict each other. Many of our students are already in school and on the bus in excess of 8 1/2 hours. Why is it necessary to add another 15 minutes?
11/13/96	Jefferson Elem. Center Faculty Senate 1103 Plum St. Parkersburg, WV 26101	5.6.5 5.6.16 5.1.27 5.2 5.9.9	Health services for all sounds great. We only have a nurse 1/2 day a week. But where is the funding for this? It is very important that policy, code, etc. state that the planning period be within the instructional day. I need the time to prepare for the rest of the day and collect materials, etc., meet with my grade level teacher. Multicultural education - need curriculum/material/funding. Finance - who finances adequate materials, equipment, etc.? Yearly inservice for new teachers with text books (perhaps provided by mentor teachers)
11/13/96	Robert L. Dillon, III 807 Greenbrier Avenue Ronceverte, WV 24970	5.1 5.1.18	For students to have daily access to library/educational technology centers or classroom libraries the state must provide funding to establish these facilities that are of the same standard at each state school. Where is the funding coming from? Where is instrumental music instruction? Students have a variety of learning styles. To remove music instruction from the curriculum is a mistake. Musical instruction assures the auditory, kinetic, visual, and tactual learner's success. It offers self discipline and teamwork that can be carried over to other subjects as well as practical application in college or the work place.

Date	Individual/Organization	Comments
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Section 5 - High Quality Standards
(Continued)

11/13/96 (Continued)
Robert L. Dillon, III
5.1.22 Career Clusters 8th Grade. To pigeon-hole students and not offer them a well rounded education will limit them in being a functional member of a rapidly changing society. (borders on discrimination).

5.1.24 By the 10th grade students will choose a career major. This is not developmentally sound. This is also more routing of individuals in an effort to be efficient and thus stifles creativity that makes each child an individual (more socialism). This assumes that every child is developmentally ready to make this decision and is unrealistic.

This country was founded on individualism and free thinking. This program discourages creativity, it discourages free thought and forces premature decisions, a precursor for later failure.

5.1.25 What if 50% of the students K-9, don't pass the presidential physical fitness test? I can see the wheels turning in those people's heads that make their living suing the state.

5.6.22 As a parent of a child who is very capable but not a standardized test taker, I take exception with this skills class. I am the parent. I pay the taxes and I will have the say about my child's class choices, not a norm-based reference standardized test. Provisions must be made for overachiever, underachievers, and the determined child.

11/14/96 Ashford Rumble Elem. Sch.
HG 64 Box 540
Ashford, WV 25009
High expectations are good for every school, but the conflict is when home environment does not foster the same expectations.

50% is too high for P.P.T., areas of low socio-economic levels will receive negative results even when progress is being made.

11/14/96 Kevin Boggs, President WVEA
1558 Quarrer St.
Charleston, WV 25311
The majority of this section of the policy simply restates or updates items contained in other policies or statutes. Our Association has commented on those items in the designated policies as they were placed on comment.

11/14/96 John McClure
1500 Bridge Road, Apt. 505
Charleston, WV 25314
5.6.23 The wording of this item should agree within the wording of item 8.2.7 on page 35 of the proposed Policy 2510.

Date	Individual/Organization	Comments
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Section 5 - High Quality Standards
(Continued)

11/14/96 S. Hetzel
Jefferson County Schools
RESA VIII comments
(Group discussion and
agreement on these)

- 5.1.18 "conduct daily or equivalent"
- 5.1.25 Eliminate - not attainable - no 2510 standard.
- 5.1.26 Delayed beyond 1997-98. Cover grades 9 to 12 not 11 to 12.
- 5.1.28 Allow waivers needed due to travel times.
- 5.6.23 Eliminate 70%ile warranty.
- 5.7.2 Incorrect. All board members must receive 7 hrs. annually.
- 5.7.3 Incorrect. Every newly elected member must receive orientation.
- 5.9.5 Eliminate this requirement. What is leadership?
- 5.10.12 Eliminate

11/14/96 Dr. Nancy Kilmon
Berkeley County Schools
401 S. Queen St.
Martinsburg, WV 25401

And

- 5.1.18 "conduct daily or equivalent"
- 5.1.25 Eliminate - not attainable - no 2510 standard.
- 5.1.26 Delayed beyond 1997-98. Cover grades 9 to 12 not 11 to 12.
- 5.1.28 Allow waivers as needed due to travel times.

Hudgins (Grant Co. Schools)
204 Jefferson Ave.
Petersburg, WV 26847

(They have identical
comments)

- 5.6.23 Eliminate 70%ile warranty.
- 5.7.2 Incorrect. All board members must receive 7 hrs. annually.
- 5.7.3 Incorrect. Every newly elected member must receive orientation.
- 5.9.5 Eliminate this requirement. What is leadership?
- 5.10.12 Eliminate.

Date	Individual/Organization	Comments
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Section 5 - High Quality Standards
(Continued)

11/14/96	Connie Huffman George Washington High Sch. 1522 Tennis Club Road Charleston, WV 25313	Work based learning for all students in grades 11-12. Every county has in place a Cooperative Ed Program that provides students with work based learning experiences. Co-Op teachers have years of experience placing students on job sites, supervising work experience, etc. We do not need to re-invent the wheel--expand on the current Co-Op Program. Contact state Co-Op teachers for assistance & info. One major concern if students are placed on non-paid job sites: liability since the student will not be covered by Worker's Comp. This MUST be addressed. Also, who would provide the students with basic safety on the job instruction?
11/14/96	Michael W. Kessinger Principal Tucker Valley El./Middle Sch. Hambleton, WV 26269	5.1.25 This is too high, unless all students have PE everyday. Would we expect our math scores to be this high if we only had math 1 day/week? Provide us with staff and this is an acceptable goal.
11/14/96	Rose T. Kessinger PO Box 161 Parsons, WV 26387	5.1.28 Very difficult in mountainous, rural counties. 5.1.21 Dr. Ed. should be taught in same school. 5.1.25 Statistical impossibility.
		5.1.28 Additional mandated time very difficult for rural counties' bus schedule!
		5.5.5 Funding???
		5.6.11 Stop with the waivers and require all day kindergarten!
		5.6.22 Materials? Time? Teachers? Too late for remediation!
		5.9.6 Requirements for attendance at Principal's Academy is way out of line!
		5.10.6 Unrealistic but idealistic (75% of time)
		5.10.8 Not until there is <u>equal funding</u> .
11/14/96	Brenda E. Smith, Teacher PO Box 267 Masonlown, WV 26542	5.1.25 None of these courses should be taken out of the list of available electives. They not only teach practical life skills which frequently are not being taught at home, but also provide training in such job-related skills as organization/ time management, safety, and appropriate interpersonal behavior. Societal pressures are increasingly stressful for families/wage earners. As such, these electives are essential to success at home and on the job.

Date	Individual/Organization	Comments
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Section 5 - High Quality Standards
(Continued)

11/14/96 Flatwoods Elem. School
PO Box 130
Flatwoods, WV 26621

Classroom libraries are not equipped with card catalogues, certified librarians, to teach library skills K-4.
30 min. planning is inadequate.

Reporting back to school after graduation could be considered an invasion of privacy.

Where do individual schools get money to copy program guides for the public?

11/14/96 Marsha Diane Michael
4 Lee St.
Petersburg, WV 26847

5.1 Let's be fair to everybody, not just the cream of the crop. If we offer AP classes, we need basic classes for remediation. We also need more technical classes for the non-college bound.

11/14/96 Marian Treadway
Shady Spring High School
PO Box 2001
Shady Spring, WV 25918

5.1.10 Some real educational value is provided by clubs, activities, and assemblies. Please don't eliminate chances for this.

5.1.19 Add - developmental guidance/life skills, especially good for self-esteem and team development.

5.1.21 Strike and change to "supporting electives such as Child Dev., Parenting, STEPS, Adult Roles and Functions, Consumer Education, Drivers Ed., Wellness, Life Skills, Communication, and Service Learning are offered"

These changes are important because families and individuals impact on work place morale and productivity. Societal pressures on families are increasing. These electives are not only important, but essential, to assuring success at home and at work.

11/14/96 Judy L. Malcolm
2730 Forrestal Ave.
St. Albans, WV 25177

5.1.16 There should be a required program of studies in the applied arts or family and consumer sciences. We teach more than the primary skills visible in our classrooms. We teach life skills, career awareness and readiness, problem solving, management skills, organizational skills, communication skills, safety awareness, working with others and other relationship skills as well as decision making. These are all necessary regardless of the career choice made. Perhaps those applied arts classes should be elevated to required status and all students could benefit from them rather than eliminating them in favor of more developmental guidance, dance and foreign language classes.

Date	Individual/Organization	Comments
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Section 5 - High Quality Standards
(Continued)

11/14/96	Margaret Lancaster Short Line School Box 328 Reader, WV 26167	5.1.14 More money needs to be provided for text books so students do not need to share. 5.1.15 Time needs to be provided to reteach. 5.1.25 If so students should have Phy. Ed. everyday.
5.1.27		This is impossible to do all this and teach and reteach. You need to hire professionals to handle this.
5.1.28		Days are already to long for students getting on a bus at 6:00 A.M. and not getting home until 4:30.
5.6.4		Parents are not always interested.
11/14/96	Joyce Chapman Winchester Avenue Sch. Berkeley	5.1.7 "ensuring" mastery - difficult to attain 5.1.16 programs are "provided" - why not required? 5.6.10 too many committees
11/14/96	Marlene Greenleaf Horace Mann Jr. High School 43rd and MacCorkle Ave. Charleston, WV 25304	Vocational ed. electives should not be eliminated. These classes offer practical living skills as well as careers and developmental guidance. Those listed in 5.1.25, as well as BASE, are an integral part of a well-rounded educational plan. Are students in grades 8 and 9 ready to choose a career path??? When are students going to have fun?
11/14/96	Coal City Elementary Faculty Senate Drawer Y Coal City, WV 25823	5.10.6 School counselors spend at least 75% of their time assisting students through individual or group counseling development guidance, academic planning. School counselors are at all schools every day. By the time they do other work required by law, they don't have time to spend 75% of their time counseling or teaching development guidance. Health services are provided to all students to maximize learning potential. We have an inadequate number of health professionals working in our county to achieve this.

Date	Individual/Organization	Comments
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Section 5 - High Quality Standards
(Continued)

(Continued)
11/14/96 Janice Kable
Jefferson County Schools

- 5.1.25 Eliminate - not attainable - no 2510 standard.
- 5.1.26 Delayed beyond 97-98. Cover grades 9-12, not 11 to 12.
- 5.1.28 Allow waivers as needed due to travel times.
- 5.6.13 Eliminate 70% He warranty.
- 5.7.2 Incorrect. All board members must receive 7 hours annually.
- 5.7.3 Incorrect. Every newly elected member must receive orientation.
- 5.9.5 Eliminate this requirement. What is leadership?
- 5.10.6 An impossible percentage of time. Mandate funding for 1 counselor to 150 students to actualize 75% counseling.
- 5.10.12 Eliminated

11/14/96 Jennifer Bates
Short Line School
PO Box 328
Reader, WV 26167

5.6.4 Must have parent involvement for this to work.

The instructional day is already too long for the younger students.

11/14/96 Kathy J. D'Antonio, WVDE
School to Work Imple-
mentation Counties (Mason,
Mercer, Wayne, Wyoming
and Gilmer)

5.1.18 Dates need reevaluated. Core daily requirements will hamper block scheduling in the Middle School.
Garner Exploration (Fall 1998)

5.1.19 1998-99 entering 9th grade class.

5.1.21 1998-1999 entering 9th grade class

- 5.1.22 1998-99
- 5.1.24 1998-99

Date	Individual/Organization	Comments
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Section 5 - High Quality Standards
(Continued)

11/14/96	(Continued) Kathy J. D'Antoni, WVDE	5.1.25 Where did this come from???
		5.1.26 In grades 9-12 (effective Fall 1998-99) Change 11-12 to 9-12.
		5.1.28 Instructional time requirements of additional 15 minutes need deleted.
11/14/96	Gail Sherman Jefferson County Schools 110 Mordington Avenue Charles Town, WV 25414	5.1.18 Are we changing the structure of program guides? Delete and make this a part of 2520. "conduct daily or equivalent"
		5.1.19 Need to postpone until 1998-99. Also, same for 5.1.24 and 5.1.26.
		5.1.25 Pres. Physical Fitness Test not a part of K. Eliminate - not attainable - no 2510 standard.
		5.1.26 Delayed beyond 1997-98. Cover grades 9 to 12 not 11 to 12.
		5.1.28 Allow waivers as needed due to travel times.
		5.10.6 Recommend that the state fund 1 counselor per 150 students.
11/14/96	Musselman Middle Sch. Faculty Senate Rt. 2, Box 119 Bunker Hill, WV 25413	5.1.18 Which foreign languages will be required? Where will teachers come from for the whole state?
		5.1.27 What class will teach multicultural ed? Will the state provide teacher training?
		5.6.3 How much money will be given to the school systems to increase our level of technology?
		5.6.6 Larger school systems need at least 1 attendance worker per 3000 students.
		5.6.11 Growth areas need adequate funding (extra classrooms, teachers, aides)
		5.7.1 School bd. members need to spend certain amount of time in school.
		5.9.6 When is Principals Academy? Where? Will principals not on contract be compensated? Is it every year?
		5.10.6 More counselors are needed to be effective. Our school has 1 counselor for 740 students.
		5.10.8 Students with computers have an unequal advantage. Parental concern is also an extra advantage.

Date	Individual/Organization	Comments
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Section 5 - High Quality Standards
(Continued)

11/14/96	Ashford-Rumble School HG 64 Box 540 Ashford, WV 25009	5.1.25 President's Physical Fitness Test - 50% is too high for students in grades K-9! Unrealistic for 50% of our students to pass the P.P.F.T. at the national level. (Revise or delete standard)
		5.1.28 Instructional Time Increases - Leave as is! Do not increase instructional time by 15 minutes! (Revise or delete standard)
		5.2.1 Unified School Improvement Plan
		5.2.2 Unified School Improvement Plan - We have enough plans to write as it is now! This will only increase work load at the schools! More paper work means less instruction and instructional leadership! (Revise or delete standard)
		5.6.2 L.S.I.G. Meetings with County Board of Ed. - Delete this standard! Waste of time! (Delete Unified School Improvement Plan Component)
		5.6.6 Duty Free Planning - Clarify instructional day versus school day! 30 minutes planning daily regardless of when it occurs if it does not increase the school day! (Revise standard)
		5.6.7 School Report Cards - Delete this standard! Report cards used for wrong purposes by media/state Dept./Parents/Community/And School Boards (We're shooting ourselves in the foot)
		5.6.22 Skill Improvement Standard - 50th percentile is too high! Eliminate this standard! Not everyone is at or above the 50% percentile. Help these students but don't punish them. (Delete this standard)
		5.6.23 Warranties/Graduates (Delete this standard)
		5.9.6 Principal's Academy Requirements - Questions on requirements! Requiring principals to attend a Principal's Academy because their school is on probation is ridiculous! Most schools in the state will be on probation is this proposed policy passes as written! (Delete this standard)
		5.10.2 Unified School Improvement Plan (Delete this standard)
		5.10.4 High Expectations - No problem with high expectations as long as they are reasonable and attainable.
		5.10.5 Reteach Daily! - No reteach daily requirement! Reteach as needed only (Revise or delete standard)
		5.10.10 Principal's Instructional Comments - Yearly! Not per semester as written! (Revise or delete standard)
		5.10.12 Advanced Placement Exam - It's unrealistic to meet or exceed national levels because everyone is not average or above! It's also impossible to increase annually! (Revise or delete standard)

Date	Individual/Organization	Comments
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Section 5 - High Quality Standards
(Continued)

11/14/96	Carolyn Zepukar 61 Orchard Drive New Martinsville, WV 26155	All children are not going to be ready for first grade. Classroom time needs to be protected for special assemblies.
11/14/96	Janice Kasserman New Martinsville School 20 E. Benjamin Dr. New Martinsville, WV 26155	5.1.19 To a certain degree classroom time should be protected, but time for special programs (cultural, social-thoses, etc.) <u>Should be allowed.</u>
11/14/96	Patrela Sullivan New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	5.1.22 How will this be implemented? Funds? 5.1.24 Foreign lang. - more teachers be needed? Longer school day? Extra funding? 5.1.29 Unrealistic - student measured in 5 areas of test, if 1 part is failed, they fail entirely.
11/14/96	Gindy Riley New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	How will this be implemented? Funds? Foreign language - will more teachers be needed?
11/14/96	Kim Underwood New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	How will this be implemented? Funds? More teachers needed for foreign languages?
11/14/96	Jo Kirk New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	5.1.25 The test goal is 50% tile in 5 test areas. If the student misses 1 question, they do not qualify for the award. 5.1.18 Foreign language will more teachers be needed? Longer school day. Extra funding?
11/14/96	Greg Richmond New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	5.1.25 The test goal is 50% tile in 5 test areas. If the student misses in one area, they do not qualify for the award. 5.1.17 & 5.1.18 Physical education should be taught daily.

Date	Individual/Organization	Comments
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**Section 5 - High Quality Standards
(Continued)**

11/14/96	Pat Wildman 655 James St. New Martinsville, WV 26155	5.1.19 To a certain degree, classroom time should be protected, but time for special programs (cultural, social themes, etc.) Should be allowed.
11/14/96	Linda Fonner New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	5.1.18 Will foreign language programs in middle schools force the cutback of other teachers and programs? If not, how will these additional teachers be funded? 5.1.25 50% will pass Presidential Fitness Test! WOW! What will be done if that number is not reached? What will be done for students who don't pass?
5.2 & 5.5		For safe, environments conducive to learning, funds will be needed. For example, poor HVAC systems need replaced.
5.6.5		Health services - Employ school nurses full time! (Not at the expense of losing a teacher - find other funding)
11/14/96	Barbara Guinet New Martinsville School 20 E. Benjamin Drive New Martinsville, WV 26155	5.1.19 To a certain degree, classroom time should be protected, but time for special programs (cultural, social themes, etc.) should be allowed.
11/15/96	Kathy C. Yost 250 Spring Valley Drive Berkeley Springs, WV 25411	5.1.25 Strike and change to supporting electives such as Child Development, Parenting, STEPS, Adult Roles and Functions, Consumer Education, Drivers' Education, Wellness, Life Skills, Communication, Service Learning are offered. (I feel these electives are not only important, but essential, to assuring success at home and on the job).
11/15/96	Jane Kitzmiller Mineral County Schools One Baker Place Keyser, WV 26726	5.1.18 "conduct daily or equivalent" 5.1.25 Eliminate - not attainable - no 2510 standard. 5.1.26 Delayed beyond 1997-98. Cover grades 9 to 12 not 11 to 12. 5.1.28 Allow waivers needed due to travel times. 5.6.23 Eliminate 70%ile warranty.
5.7.2		Incorrect. All board members must receive 7 hrs. annually.

Date	Individual/Organization	Comments
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Section 5 - High Quality Standards

(Continued)

11/15/96 (Continued)
Jane Kitzmiller
Mineral County Schools

5.7.3 Incorrect. Every newly elected member must receive orientation.

5.9.5 Eliminate this requirement. What is leadership?

5.10.12 Eliminate

11/15/96 Mike Burke
Mineral Co. Bd. of Ed.

5.1.18 Core programs taught daily...this would not allow implementation of block schedule in middle school-delete daily.

1 Baker Place
Keyser, WV 26726

5.1.25 Physical Fitness test (50%) -Delete physical fitness STD from policy.

5.1.28 Instructional day-Maintain 315/330/345 standard

5.1.26 Work based...11-12 change to 9-12.

11/15/96 Ronald E. Ray, Director
of High Schools & Voc. Ed.
P. O. Box 770
Ripley, WV 25271

5.1.25 With all of the emphasis and requirements for school-to-work and work-based learning, why would you eliminate the vocational electives in four service areas? In addition, Policy 2530.02, which is not being replaced, requires that parenting education be offered based on state law 61-8-9a. 5.1.26 This standard does not reflect Policy 2510. Policy 2510 states: "Provide work-based learning experiences for each student at some time in grade 9, 10, 11, or 12. (Effective Fall 1998)" not "in grades 11-12 (Effective 1997-98)."

5.10.12 Requiring the percentage of students passing the AP Exam to meet or exceed the national level or to increase annually will result in the encouragement of only the better students to take the test so that the percentage passing will remain high. Then, based on 2510, only those students will be able to receive AP credit for the course.

11/15/96 Sherman High School
Seth, WV
Boone Co. School System

5.1 School counselors spend at least 75% of their time assisting students through individual or group counseling, developmental guidance, academic planning, and career counseling.

5.2 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.

5.3 The percent of students passing the advanced placement examination meets or exceeds the national level or increases annually.

1. No comment.

Date	Individual/Organization	Comments
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**Section 5 - High Quality Standards
(Continued)**

11/15/96 (Continued)
 Sherman High School
 Boone County School System
 instructional time to do counseling? If not, then who will see that this plan is carried out?
 2. Who will write and oversee these plans? Counselors will not have time if they spend 75% of their time doing counseling, developmental guidance, academic planning, and career counseling. Are you suggesting that teachers should take part of

3. Advanced placement students cannot be required to take the AP test. Also pre-screening of these students is discouraged. How do we address these problems?

11/15/96 Dob Gutshall 5.1 Vocational funds are cut annually. We continually have to choose whether to update curriculum texts or equipment. This needs to be added (texts) to county's list of approved texts.

Main streaming has ruined education. We need to group students according to their abilities and have instructional aids to help in classrooms.

Keyboarding needs to be in middle school.

Need a guidance secretary to free up our guidance counselor's work load.

5.3 Privatize the transportation before the state goes totally bankrupt.

5.10.7 A five year plan is a good idea but we cannot control that fifth year. They are gone and what was put on paper is history for some.

5.10.12 Advanced placements tests are paid by the students. We cannot afford to pay these fees. This is unrealistic and a burden to the counties.

11/15/96 Keith A. Herrick 5.18 Program guides available. Define program guides. This is vague and seems useless. What is the intent of this?

Magnolia High School
 601 Maple Avenue
 New Martinsville, WV 26155, 5.19 Co-curricular and extra-curricular programs outside school hours. This is not good. It will reduce student outside opportunities.

E.M. Miller 5.1.25 50% increase in passing President's Fitness test is excessive.

Magnolia High School
 714 N. Main St.
 New Martinsville, WV 26155, 5.1.26 Full year of work based experience. Meaningful work is impossible to find for many students in a rural state. Where will staff and funds come from to find work placement, monitor students, etc.?

Date	Individual/Organization	Comments
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Section 5 - High Quality Standards
(Continued)

11/15/96	Rebecca J. Moore 12 South 1st Avenue Paden City, WV 26159, And Darrell A. Ballard Magnolia High School	5.25 Faculty Senate funds - Do guidance Counselors receive funds, too? 5.6.11 These two items are badly out of logical order. 5.6.12
11/15/96	Catherine Leatherman 2539 Lee Drive Parkersburg, WV 26101	5.1.25 The Family and Consumer Sciences Curriculum include learning objectives that include career awareness self-development, leadership skill development, critical thinking, and life skills necessary to prepare for the workplace. These should be kept and not put into the curriculums that are already overlooked.
11/15/96	Karen Kincheloe 1706-34th St. Parkersburg, WV 26104	5.1.25 Family and Consumer Science classes already include critical thinking skills, leadership skills, parenting, and nutritional/health skills -- Why would these classes not be required? Do no take them out of the curriculum.
11/15/96	Donna Gault 1808 33rd St. Parkersburg, WV 26104	5.1.25 Family and Consumer Sciences have had in their curriculum three courses that teach improving self concept, career exploration and development leadership skills, critical thinking, logical reasoning, and consequences. These three classes are Adult Roles, Steps, and Parenting. Please do not remove the requirement from the required curriculum for student graduation. This training needs to continue being taught to teens in family and consumer science classes. Allow us to continue assisting our students to understand themselves and solve problems.
11/15/96	Carolyn McBee Route 8, Box 200H Morgantown, WV 26505	5.1.18 Due to the nature and decline of family structure, Family and Consumer Sciences is the only curriculum that teaches family life skills. Please allow us to prepare students for their future.
11/15/96	Ronald E. Ray Director of High Schools & Vocational Education P.O. Box 770 Ripley, WV 25271	5.1.25 With all of the emphasis and requirements for school-to-work and work-based learning, why would you eliminate the vocational electives in four service areas? In addition, policy 2530.02, which is not being replaced, requires that parenting education be offered based on State Law 61-8-9a. 5.1.26 This standard does not reflect Policy 2510. Policy 2510 states: "Provide work-based learning experiences for each student at some time in grade 9, 10, 11, or 12. (Effective 1997-98)." 5.10.12 Requiring the percentage of students passing the AP exam to meet or exceed the national level or to increase annually will result in the encouragement of only the better students to take the test so that the percentage passing will remain high. Then, based on 2510, only those students will be able to receive AP credit for the course.

Date	Individual/Organization	Comments
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**Section 5 - High Quality Standards
(Continued)**

11/15/96	Georgia Ann Vogan, Teacher Family & Con. Science 2509 Charlestown Road Martinsburg, WV 25401	5.1.25 These are course not teach skills that can be used in many skills not only in the home, but in many job opportunities from entry level to professional. It would be of value to all students to retain this area.
11/15/96	Leshie M. Stilwell, Teacher Musselman High School Rt. 2, Box 122 Bunker Hill, WV 25413	5.1.25 I had an honors student last year who wrote me and told me she will use my classes far more than the honors classes she has had. We need to look at all students not a mold we are trying to create. See 61-8-9A law.
11/15/96	Dr. Sandra Garrett Lutz 914 Lauman Avenue Bridgeport, WV 26330	5.1.18 Add: Life skills 5.1.19 Add: Supportive electives 5.1.28 Families are our future! Please allow us to teach curriculum that directly affects them.
11/15/96	Brenda J. Martin Ripley High School Ripley, WV 25271	5.1.25 The removal of the Family and Consumer Science electives - STEPS, Adult Roles, and Parenting, will affect the basic life skills that all students need. The information provided by these classes are useful in everyday living and job skills - decision making, problem solving, leadership, organization, management alone with health leaving food and nutrition. They also develop communication skills by learning how to present information. They also develop skills needed to be home owners, etc., use as money management, consumer ed., etc.
11/15/96	Sharyn Wells 43 Mt. Pleasant Ests. Mineral Wells, WV 26150	5.1.25 All these things that need to be taught like improving self concept, career exploration, and development and leadership skills are all being taught in the Family and Consumer Sciences classes now. These need to be reinstated. Don't take these classes out of the requirements of electives to be taught. They are needed.
11/15/96	Nancy L. Guttip 700 29th St. Vienna, WV 26105	5.1.25 Family and Consumer Sciences had/has in their curriculum 3 courses that taught/teach improving self concept, career explorations, and development and leadership skills, critical thinking, logical reasoning and consequences. Why take or totally remove these requirements from the required curriculum requirements for graduation. It was in there - PUT IT BACK!
11/15/96	Lois Christine Bright FACS Teacher 435 Flatwoods Run Rd. Sutton, WV 26601	Time management skills, organizational skills, safety, working with others, decision making are necessary for any career choice. These life skills are essential to all.
11/15/96	Rosemary Markley PO Box 412 MHI Greek, WV 26280	5.1.25 Do Not Strike

Date	Individual/Organization	Comments
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Section 5 - High Quality Standards
(Continued)

11/15/96 Alice Wise
Rt. 1, Box 190 G
Elkins, WV 26241

5.1.25 Do Not Strike

11/15/96 Frances Jurick
Family and Consumer Sciences
1210 McLane Dr.
Fairmont, WV 26554

5.1.25 Retain the following electives - STEPS, Adult Roles and Functions, Parenting Education.

11/15/96 Jennifer Rakocky
Family and Consumer Sciences
Box 37
Kingmont, WV 26578

5.1.25 Retain the following electives - STEPS, Adult Roles, and Functions, Parenting Ed. From the 4 service areas.

11/15/96 Sarah Dixon
1870 Crossroads
Konova, WV 25530

5.1.25 Why was Family and Consumer Sciences classes struck out. We teach the job readiness skills and other needed skills.

11/15/96 Lillian Mickliff
Family & Consumer Sciences
Toisla High School
#1 Rebel Dr.
Fort Gay, WV 25514

5.1.25 All areas of Family and Consumer Sciences are struck but never redone any where. These classes dealt with careers decision making, management, preparing students for work with applications, portfolios, interviewing, etc. Those should be required by all students including Parenting, Child Development and Care.

11/15/96 V. Richards
502 Ruffner
Charleston, WV

5.1.25 The State is totally eliminating the course that help the child to develop socially, emotionally, mentally and physically. Our course offering also help a student to become a productive citizen in our society and also a family member. Where are our students going to be given the opportunity to learn these SKILLS? Certainly not in math or English class. By eliminating these course offerings were continuing to produce students who are "at-risk". A fact, society is relying more and more on the schools to teach their children these skills. The breakdown of the family continues. In the 1910's when family and community were there to teach there children skills a work ethics is not today! Peer groups and media are the main influences. I would hate to see society when they learn to resolve conflict through our TV shows! Yell, some fight and kill! As a matter of fact, we're there!! Resolving conflicts and getting along peaceful is a major part of my program. Please, as a parent, you are doing a disservice to our students and future generation by eliminating these courses as electives! Presidential Physical Fitness alone doesn't cut it. However, teamed up with Parenting and STEPS, Adult Roles, and function we are producing a well rounded, whole person!! Please think twice. What I teach is valuable to my students!! My students may sign up wanting to "cook and sew" but what they leave with is a lot more than that.

Date	Individual/Organization	Comments
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Section 5 - High Quality Standards
(Continued)

11/15/96	Shirley Layne Family & Consumer Sciences 703 Breezemoor Dr. Charleston, WV 25302	5.1.18 Support electives added to all career electives should include: Parenting, Adult Roles and Functions, STEPS, Consumer education, Life skills, community service learning. I believe these should be added because of the impact the individual (family life) on morale and productivity on the job site. These courses are an absolute essential to maintain successful job and home life.
11/15/96	Lorna Frye PO Box 91 Shenandoah Junction, WV 25442	5.1.18 Life skills and career readiness are offered through cooperative learning experiences that focus not on the primary skills taught (food preparation, for example) but also includes time management skills, organizational skills, safety awareness and working with others, which is necessary regardless of career choice(s). Leadership skills are taught through our youth organizations.
11/15/96	Donna Suplita Marion Co. FACS Teacher EFHS Route #2, Box 284 Fairmont, WV 26554	5.1.25 <u>Retain:</u> The following electives STEPS, Adult Roles and Functions, and Parenting Education. Also offerings from 4 service areas. Teachers in FACS teach Decision making skills, Communication skills, Leadership skills, and Management skills, just to name a few. We teach education offering college articulation credits.
11/15/96	Susan Ann Alasky RR 1, Box 315 Farmington, WV 26571	5.1.25 Retain the following electives - STEPS, Adult Roles and Functions, Parenting Ed. These classes help students develop skills needed to manage family and career goals and become responsible adults in the work force.
11/15/96	Patricia Gray Rt. 2, Box 306B Lewisburg, WV 24901	5.1.18 Make base and stops required electives -- Grades 5-8. Retain the following electives: STEPS, Adult Roles and Functions, Parenting Education. All these classes help students develop skills needed to manage family and career goals and become responsible workers.
11/15/96	Judith Pyles 1734 Rolling Hills Circle Charleston, WV 25314	5.1.25 Each student needs to be viewed as a <u>whole person</u> not an academic robot! Retain, STEPS, Adult Roles and Functions, Parenting Ed. - Family and Consumer Sciences. All of these classes teach decision-making. Retraining of staff by county administration is essential.

Date	Individual/Organization	Comments
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Section 5 - High Quality Standards
(Continued)

11/15/96	Nancy Gibson Herbert Hoover High School PO Box 10104 Charleston, WV 25357	5.1.18 Life skills and career readiness are offered through cooperative learning that focus on management, organization safety and human processing which can be related to any Career Choice. Leadership is taught thru youth organizations. 5.1.25 Do not strike STEPS, Adult Roles, Parenting!
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11/15/96	Jane Vickers, State Supv. Family & Consumer Sciences 1900 Kanawha Blvd, E. Bldg. 6, Rm. 243 Charleston, WV 25305	5.1.17 The Adult Roles, STEP, & BASE courses provide all of the mentioned objectives -- self-understanding, self concept, interpersonal relationships, decision making, career awareness, career exploration and educational/career choices. These courses are valuable to each student yet all have been stricken from the policy. I see little similarity between Senate Bill 300 and this policy. 5.1.25 Please consider these comments. Our students are in need of the life skills taught in the courses that have been stricken from this Policy. Other curriculum does not contain this content. STEPS, ADULT Roles and functions, Parenting Ed. are courses that teach life skills. Skills that all students need to be well developed citizens, family members, and employees. Without such skills their careers suffer. The content areas of these courses should be reinstated. At least give the students an opportunity to elect those courses. Life skills all important for success in all careers.
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11/15/96	Brenda Smith Preston High School 400 Preston Drive Kingwood, WV 26537	5.1.10 Clubs, activities, and assemblies are an important part of social skills, leadership skills, supplemental activities to reinforce instruction, etc. Don't eliminate. 5.1.25 Family and Consumer Sciences classes teach life skills. It's the only group of classes students can take then go out and survive in the real world.
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11/15/96	Lisa Maple 410 Stanaford Rd. Beckley, WV 25801	5.1.10 There is real educational value in club activities, assemblies, and other activities. 5.1.19 ADD: developmental guidance/life skills, especially good for self-esteem and team development. 5.1.25 STRIKE and change to supporting electives such as Child Development, Parenting, STEPS, Adult Roles and Functions, Consumer Ed., Drivers Ed., Wellness, Life Skills, Communication and Service Learning are offered.
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These changes are important because families and individuals impact on workplace morale and productivity. Societal pressures on families are increasing. These electives are not only important, but essential to assuring success at home and at work.

Date	Individual/Organization	Comments
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Section 5 - High Quality Standards
(Continued)

11/15/96	Mary Sue Gartley 102 Rustle Highlands Hurricane, WV 255526	5.1.18 Career exploration is a major part of the middle school curriculum, commonly known as BASE (Family & Consumer Science/Home Economics - Concepts included decision making, critical thinking, communication skills, self-understanding, and interpersonal relationship.
	5.1.19	ADD: Developmental guidance, life skills. Especially good for self-esteem and team development.
	5.1.21	Supportive electives such as child development, STEPS, Adult Roles and Functions, Consumer Education, and Service Learning should be added.
11/15/96	Anne Murphy Cahoun County High School Grantsville, WV 26147	5.1.18 FACS (Home Ec) has been eliminated. We (FACS) teach career education, communication skills, leadership skills, critical thinking skills in our areas.
	5.1.25	FACS was taken completely out and replaced with 50% - Family and Consumer Science offer skills (as listed above) that enable students to reach 50% physical fitness. We teach the nutrition, problem solving, stress management, organization skills, and critical thinking skills which are the base for getting physical fit. How are you going to get physically fit? One needs the emotional maturity before going out and exercising. Our areas have articulation agreements with colleges for certain classes in their programs - They met college requirements - We are academic with high standards.
11/15/96	Dr. Richard Adkins, Ex. Dir. Boone County Schools 69 Avenue B Madison, WV 25130	5.1.25 President's Physical Fitness Test - 50% is too high for students in grads K-9! Unrealistic for 50% of our students to pass P.P.F.T. at the national level!
	5.1.28	Instructional Time Increases - Leave as is! Do not increase instructional time by 15 minutes!
	5.2.1	Unified School Improvement Plan - We have enough plans to write as it is now! This will only increase work load at the school. More paperwork means less instruction and instructional leadership!
11/15/96	Pamela White Ashford-Rumble Elementary HG 64, Box 540 Ashford, WV 25009	5.1.15 50% too high
	5.1.28	Leave as is - no increase
	5.6.22	50th percentile too high/eliminate this
	5.10.5	Reteach as needed only

Date	Individual/Organization	Comments
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Section 5 - High Quality Standards
(Continued)

11/15/96	Amy White HG 81, Box 7A Peytona, WV 25154	5.1.25 50% is too high for P.P.T. 5.6.22 Not everyone is average or above average. 50th percentile is too high.
11/15/96	Nancy L. Justice, Teacher Ashford-Rumble Elem. HG 64, Box 540 Ashford, WV 25009	5.10.4 People rise to meet reasonable expectations, however unreasonable expectations causes frustration and failure. 5.1.25 % is too high - especially when we do not have P.E. every day. 5.1.28 Do not increase instructional day! (especially in elementary) 5.2.1 & 5.2.2 Too much paperwork 5.6.7 waste of time and paper 5.6.22 Unrealistic! 5.10.5 Reteach occurs as needed

Date	Individual/Organization	Comments
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Section 6 - County Annual Improvement Process

11/13/96 JH Brown 6.1 All agencies need to accept the same form.
 P0 Box 328
 Reader, WV 26167

11/14/96 S. Hetzel 6.4 Intentional falsification.
 Jefferson County Schools
 RESA VIII comments
 (Group discussion and
 agreement on these)

11/14/96 Dr. Nancy Kinnon 6.4 Intentional falsification.
 Berkeley County Schools
 401 S. Queen St.
 Martinsburg, WV 25401

11/14/96 Hudgins 6.4 Intentional falsification.
 Grant County Schools
 204 Jefferson Avenue
 Petersburg, WV 26847

11/14/96 Flatwoods Elem. School 6.1.6 Is the duty-free planning period daily?
 PO Box 130
 Flatwoods, WV 26621

11/14/96 Faculty Senate 6.1.6 Where does the funding/training come for this skill improvement program? A warranty seal or stamp concerns
 Summersville Jr. High
 40 Grizzly Rd.
 Summersville, WV 26651
 me - a guarantee on a "one time only" test doesn't seem fair to either side. (Especially the test anxious student
 who is an excellent student but just happens to not score well on one test). Absence of the stamp would be quite
 a blow.

11/14/96 Judy L. Malcolm 6.5 Shouldn't this say who is on teams & what the consequences are, how long they will stay, etc.?
 2730 Forrestal Ave.
 St. Albans, WV 25177

11/14/96 Margaret Lancaster 6.1 & 6.2 All agencies need the same form - to much paper work.
 Short Line School
 Box 328
 Reader, WV 26167

Date	Individual/Organization	Comments
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Section 6 - County Annual Improvement Process
(Continued)

11/14/96	Janice Kable Instructional Specialist Jefferson County Schools P0 Box 987 Charles Town, WV 25414	6.1 Change to July 1, 1998.
11/14/96	Jennifer Bates Short Line School P0 Box 328 Reader, WV 26167	6.4 Intentional falsification - add word intentional.
11/14/96	Kathy J. D'Antoni, WVDE School to Work Imple- mentation Counties (Mason, Mercer, Wayne, Wyoming and Gilmer)	6.1 All agencies need t accept the same form.
11/14/96	Gail Sherman Jefferson County Schools 110 Mordington Avenue Charles Town, WV 25414	6.2 By Summer of 97 (Makes this consistent with Policy 2510 page 36, 8.41.)
11/14/96	Musselman Middle Sch. Faculty Senate Rt. 2, Box 119 Bunker Hill, WV 25413	6.4 Add intentional before falsification.
11/14/96	Sherman High School Sett, WV Boone Co. School System	6.4 Intentional falsification.
11/14/96	Musselman Middle Sch. Faculty Senate Rt. 2, Box 119 Bunker Hill, WV 25413	6.5 Why are the on-site review teams coming unannounced?
11/14/96	Sherman High School Sett, WV Boone Co. School System	6.1 Each county completes and submits a Unified Improvement Plan to the West Virginia Department of Education by November 1, 1997 and an update each year thereafter. This plan outlines details for meeting high quality standards and performance measures that have not been met.
11/14/96	Musselman Middle Sch. Faculty Senate Rt. 2, Box 119 Bunker Hill, WV 25413	6.2 Periodic, random, and unannounced on-site review teams assess the county's and schools' compliance with the high quality standards and performance measures.
11/14/96	Sherman High School Sett, WV Boone Co. School System	1. There is very little time given to counties to meet these standards by November 1997. No new funding has been supplied, and new curriculum have not been offered. The state has set counties up for immediate failure. This does nobody any good.
11/14/96	Musselman Middle Sch. Faculty Senate Rt. 2, Box 119 Bunker Hill, WV 25413	2. No comment.

Date	Individual/Organization	Comments
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Section 6 - County Annual Improvement Process
(Continued)

11/15/96	Jane Kizmiller Mineral County Schools One Baker Place Keyser, WV 26726	6.4 Intentional falsification
11/15/96	Mike Burke Mineral Co. Bd. Of Ed. 1 Baker Place Keyser, WV 26726	6.4 Falsification of information <u>insert intentional before falsification of information....</u>
11/15/96	Shirley Layne Family & Consumer Science 703 Breezmont Dr. Charleston, WV 25302	6.7.2 Co-curricular activities needed to remain as an extension of the classroom. Students should not be expected to do everything after school. In my areas students will not be able to participate because of a lack of transportation. Work place skills such as teamwork, interpersonal relationships, critical thinking, problem solving, and leadership development are a result of these opportunities in class.

Date	Individual/Organization	Comments
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Section 7 - School Accreditation Process

11/13/96	Jill Brown PO Box 328 Reader, WV 26167	7.2.7.3 Too subjective a way to rate a school. Not all teams rate the same.
11/13/96	Pat Conaway, Principal Sylvester Elementary PO Box 610 Sylvester, WV 25193	7.3.2 The WVDE should not have the power to disapprove of our county improvement plan.
11/14/96	John McClure 1500 Bridge Road, Apt. 505 Charleston, WV 25314	7.2 Does this mean that a school must meet 100 percent of the standards? If so, it would be clearer to use the following language: Full accreditation status shall be issued to a school when the measure of the school's student and school performance is at a level that meets all of the high quality educational standards and the annual performance measures in this policy.
11/14/96	Margaret Lancaster Short Line School Box 328 Reader, WV 26167	7.3.1 All forms of evaluation need to be standard for each school.
11/14/96	Sam Snyder Short Line School Box 328 Reader, WV 26167	Not objectives, concrete criteria not subjective measures (7.3.1)
11/14/96	Musselman Middle Sch. Faculty Senate Rt. 2, Box 119 Bunker Hill, WV 25413	7.1 The term "seriously impaired status" is inappropriate.
11/14/96	Ashford Rumble School HG 64 - Box 540 Ashford, WV 25009	7. (Sec. 1.3.577) School Accreditation Status - Accreditation status labels for schools are used for the wrong purposes by media/parents/state dept. and local board of ed.1 (Do not release results) We're sitting ourselves up for failure with this type of labeling of our schools! All schools can and want to improve but please help our schools and students by not hurting them with labels! We're shooting ourselves in the foot! Success breeds success/failure breeds failure. (Delete standard!)
		7.1 Probationary Status - Increase time from 1 year to 3 years for a school to get off probation! (Delete U.S.I.P. Component 1 (Revise or delete standard!))

Date	Individual/Organization	Comments
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Section 7 - School Accreditation Process
(Continued)

11/14/96	Sherman High School Seth, WV Boone Co. School System	7.1 Probationary accreditation status shall be issued to a school when the measure of the school's performance is below established standards and performance measures.
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1. If counties are not given adequate funding and time to meet these elevated goals, it is possible that only the most affluent schools with little unemployment or poverty will be able to meet the high expectations.

11/15/96	Judith Pyles 1734 Rolling Hills Circle Charleston, WV 25314	Good Idea.
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11/15/96	Pamela White Ashford-Rumble Elementary HC 64, Box 540 Ashford, WV 25009	7.1 Increase time from 1 yr to 3 yrs for a school to get off probation
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Date	Individual/Organization	Comments
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Section 8 - Seriously Impaired Status

11/14/96	Ashford Rumble Elem. Sch. HG 64 Box 540 Ashford, WV 25009	8.4 Accreditation should be on 3 year basis instead of 1 year.
11/14/96	Ashford Rumble Elem. Sch. Danny B. Kirk, Principal HG 64, Box 540 Ashford, WV 25009	8.5 The definition is too broad. There are many circumstances beyond the school's/teachers control.
11/14/96	Ashford Rumble Elem. Sch. Danny B. Kirk, Principal HG 64, Box 540 Ashford, WV 25009	8.1 Student Performance - 30th percentile for 3 years in a row! Not yearly! (Revise or delete this standard)
		8.2 Attendance Component - At or below 80% for 3 years in a row! Not yearly! (Revise or delete this standard)
		8.3 Dropout Rate - 9% requirement is too high! 5% may be reasonable! (Revise or delete this standard)
		8.4 Full Accreditation Criteria - 3 consecutive years! Not yearly as stated! (Revise or delete this standard)
		8.5 Extraordinary Circumstances - Definition too broad! Many things are beyond the school's/teachers/control (Delete failure of a school to improve its probationary status)
		8.5.3 Non-approval Status - Give counties/schools 3 years instead of 1 year to correct impairments. (Revise or delete this standard)
		8.5.4 Probationary/Seriously Impaired Status - Revise to cover only schools labeled seriously impaired! Most schools will be on probation if these revised accreditation standards go into effect as written! If students want to transfer I say let them but only if a school is seriously impaired for 3 consecutive years and not at the schools or counties expense. Include county transfer policies/requirements! We're shooting ourselves in the foot again! (Revise or delete this standard)
11/14/96	Musselman Middle Sch. Faculty Senate Rt. 2, Box 119 Banker Hill, WV 25413	8.5.1 Why is there no member of the impaired school on the team of improvement consultants?
		8.5.4 How can a school incur expenses for a student transferring to a fully accredited school? What if all high schools in the area are on probationary status?
11/14/96	Sherman High School Seth, WV Boone Co. School System	8.1 The county and school shall correct all on-site review findings of noncompliance within one year of West Virginia Board of Education approval of the report. If findings of noncompliance have not been corrected, the school shall automatically be issued probationary accreditation or seriously impaired status.
		8.2 Whenever a school is issued probationary status or 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.
		1. Without new funding sources, a year will not be enough time to correct noncompliance with those goals.

Date	Individual/Organization	Comments
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Section 8 - Seriously Impaired Status
(Continued)

11/14/96 (Continued)
 Sherman High School
 Boone County Sch. System

2. If a school is on probation and loses its accreditation, how could they afford to pay student tuition to other schools? This could impoverish already poor school systems, and enrich schools that already have a healthy enrollment with adequate facilities.

11/15/96 Judith Pyles
 1734 Rolling Hills Circle
 Charleston, WV 25314

Lowering the dropout rate is good but dropping electives that help a student realize their full potential is not a good idea -- include Family and Consumer Science classes.

11/15/96 Pamela White
 Ashford-Rumble Elementary
 HG 64, Box 540
 Ashford, WV 25009

8.1 30th percentile for 3 yrs in a row - not yearly

8.2 at or below 80% for 3 yrs in a row - not yearly

8.3 9% too high

8.4 3 consecutive years - not yearly

8.5 too broad

8.5.3 3 yrs instead of 1 yr

11/15/96 Amy White
 HG 31, Box 7A
 Peytona, WV 25154

8.4 Accreditation should be done on a 3 year basis and not yearly.

8.5.4 If these standards pass, many schools will be on probation. The schools should not be responsible to pay if a student transfers.

Date	Individual/Organization	Comments
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Section 9 - County Approval

11/14/96 Mark Carl Fawcett Fiscal Concerns: These are mandates without funding. With teacher/pupil ratios and added demands where will additional staff be found and how will they be funded? Do not make requirements without funding them.

601 Maple Ave.
Magnolia High School
New Martinsville, WV 26155

These lofty goals are admirable, but unrealistic. They are utopian, rather than reasonable. Yes, we should aim high, but we should also remain in touch with reality.

11/14/96 Musselman Middle Sch. 9.5 Probationary time of 1 year is too short. What does nonapproval entail?
Faculty Senate
Rt. 2, Box 119
Bunker Hill, WV 25413

11/15/96 Judith Pyles Higher standards and expectations are commendable!
1734 Rolling Hills Circle
Charleston, WV 25314

Date	Individual/Organization	Comments
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Section 10 - On-Site Review

11/14/96	Judy L. Malcolm 2730 Forrestal Ave. St. Albans, WV 25177	10.18	Would like some kind of protection from false and vindictive allegations which are unfounded.
11/14/96	Joyce Chapman Winchester Ave. School 650 Winchester Avenue Martinsburg, WV 25401		implementation of <u>ALL</u> policies many longer than 1 year.
11/14/96	Ashford Rumble School HG 64 - Box 540 Ashford, WV 25009	10.7	Accreditation Status Information Release - Delete Standard! Do not release accreditation information to public or media in the form of newspaper articles/school report cards/etc. Results are utilized improperly by media/public/parents/community/state dept./and local Board of Education. The results of accreditation should be to improve and help schools/ students/personnel. Not hurt them! Talk about shooting yourself in the foot! The only way I release accreditation results would be under the freedom of information act! (Delete standard!)
11/15/96	Judith Pyles 1734 Rolling Hills Circle Charleston, WV 25314	10.10	Good Idea.
11/15/96	Dr. Richard Adkins, Ex. Dir. Boone County Schools 69 Avenue B Madison, WV 25130	10.9	Use random selection process only! Do not use weighted random selection samples!
11/15/96	Pamela White Ashford-Rumble Elem. HG 64, Box 540 Ashford, WV 25009	10.7	delete standard I use improperly by media-public-parents
11/15/96	Nancy L. Justice, Teacher Ashford-Rumble Elem. HG 64, Box 540 Ashford, WV 25009	10.9	use random selection process
11/15/96	Nancy L. Justice, Teacher Ashford-Rumble Elem. HG 64, Box 540 Ashford, WV 25009	10.7	Info. confidential & should stay that way.

Date	Individual/Organization	Comments
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GENERAL COMMENTS

11/13/96 Harpers Ferry Junior High
 Faculty Senate
 Todd Chichehrichl
 Senate Chair

As educators, we agree that our State Educational System must revise and update current policies and requirements in order to prepare students for the 2000 school year and thereafter. However, the proposed policies and regulations in S.B. 300 are rigorous and unreasonable.

There are too many expectations and standards required to be implemented in an unrealistic amount of time. Drastic changes in curriculums and assessment procedures should not be made without more local level input from individual county school systems. All disciplines should be represented before educational programs, co-curricular, and extra-curricular activities are eliminated. Teacher input and recommendations must be considered before changing educational objectives.

We feel S.B. 300 should not be approved because more time is required for discussion and implementation.

11/13/96 Robert L. Dillon, III
 807 Greenbrier Avenue
 Romeoverte, WV 24970

The overall idea of this program has merit, but to departmentalize humans at such an early age will lead the society to more isolationism. By pulling students from classes and placing them in skills classes is not an emotionally sound practice. It will lead to more behavior problems. Not ever child in this state needs this strict, socialistic approach to education.

I strongly suggest several years of pilot programs prior to implementation of these radical policies.

11/13/96 Donna Adams, Supervisor
 Cabell County Schools
 PO Box 446
 Huntington, WV 25709

This statement that all children entering first grade will be ready for first grade is a goal we have been striving to meet for several years. When "All Day Kindergarten" was mandated, we felt this was an excellent opportunity to give children the time they needed to be ready. However the new Goals and Objectives have pushed down some objectives from first grade that will hinder rather than help us meet the goal.

The standard of having those in the lowest quartile improve by 50% is unreachable.

11/14/96 Judy L. Malecjm
 2730 Forrestal Ave.
 St. Albans, WV 25177

Your section on High Quality Standards needed more room for writing comments unless it is your intention to simply obtain a rubber stamp of the new policies! Some arrangements should have been made to prevent all these policies from having the exact same comment deadline as this is unfair to the policy readers and lends one to believe the rubber stamp is all you really seek!

11/14/96 Musselman Middle Sch.
 Faculty Senate
 Rt. 2, Box 119
 Bunker Hill, WV 25413

5.1.25 From past records at Musselman Middle School we feel that 50% of children K-9th grade would not be able to obtain national standards in the Physical Fitness Test. In 1994-95 MMS only had 13% of the student body pass and in 1995-96 only had 19% achieve national standards.

Today on the middle school level we feel that children do not have the upper body strength nor do they have the endurance to achieve the standards that are required for national status.

We feel that the national standards are to the point in every category that most students do not possess the ability to obtain national standards in all the areas required.

We feel that 25% would be more obtainable.

Date	Individual/Organization	Comments
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General Comments
(Continued)

11/14/96 Ashford Rumble School

HG 64 - Box 540

Ashford, WV 25009

Content -The proposed Performance Measures are too high #1 Standards needs to be lowered to a reasonable and attainable level. According to my information 1/2 of the counties in the state did not achieve full accreditation full accreditation with the old standards. What will happen if the standards increase?

On-site review process - Delete - Student/school performance measures. The purpose should be to help schools and students, no hurt them as per current and proposed revisions to Polley 23201

Overview - Page 2 - Paragraph 1 - This is nothing but outcome based ed.

Paragraph 2 - Prop/delete - the primary emphasis of accountability is school and student performance! (Outcome Based Ed.) Standards are too high! Standards are unreasonable/unattainable!

NOTE: We should be helping schools and students achieve! (Success breeds success)!!! and (Failure breeds failure)!!!

11/15/96

Keith A. Herrick

Magnolia High School

601 Maple Avenue,

FISCAL CONCERNS: These are mandates without funding. With teacher/pupil ratios and added demands, where will additional staff be found and how will they be funded? Do not make requirements without funding them. These lofty goals are admirable, but unrealistic. They are utopian, rather than reasonable. Yes, we should aim high, but we should also remain in touch with reality.

E.M. Miller

Magnolia High School

714 N. Main St.

New Martinsville, WV 26155,

Rebecca J. Moore

120 South 1st Avenue

Padon City, WV 26159,

And

Darrell A. Ballard

Magnolia High School

Date	Individual/Organization	Comments
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General Comments
(Continued)

11/15/96	Katie Begale P.O. Box 752 Shepherdstown, WV 25443	It appears to me when electives are removed from options for marginal drop-outs you are encouraging them to drop out. Academically strong students will continue to excel, weak ones need all help they can get at the federal level, more emphasis is even placed on family and individuals. Life skills, nurses are important for self-esteem, goal setting, diversity, tolerance.
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11/15/96	Dr. Richard Adkins, Ex. Dir. Roone County Schools 69 Avenue B Madison, WV 25130	The proposed changes in current policy are considerable and there is not sufficient time for careful thought and analysis. There may be many hidden costs in what may first appear as good ideas. For example, introducing foreign language at the middle school is a good concept, but most counties could only afford to add now foreign language teachers if other teacher positions are cut. When additional graduation requirements are added to the curriculum, when work-based experiences are mandated for some high school students and when computer technology is to be included in all programs of study there is an inherent cost which most counties simply can not afford.
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We recommend no State Board action be taken on any policy until March, 1997. We recommend additional policy hearings be scheduled each month through February of 1997. We recommend a complete and thorough cost analysis of all policies.

COMMENT LOG

November 15, 1996

Date	Individual/Organization	Comments
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November 15, 1996

Dr. Barbara J. Fassig
2203 National Road
Wheeling, WV 26003

SECTION 4

4.14

To have sixty percent of the students attain a minimum level of performance at the 50th percentile is high. It would seem to be more realistic to expect that 50% of the students perform at the 50th percentile. This percentage would then also agree with 4.1. Students that do not perform at the 50th percentile are usually those that drop out. Students scoring below the 50th percentile need to be encouraged to stay in school and to be helped. A percentage lower than 60% of the students may help to keep more students in school even if they don't reach the 50th percentile.

4.15

At the 70th percentile, it would be expected that in a class of 400 students, 132 students perform at the 70 percentile in each area. High expectations are really needed, but the 70% percentile may be too high for many schools and many students. Students can still be prepared, achieve A's and not necessarily score at the 70th percentile on a norm-referenced test.

Performance data can be analyzed prior to the start of the school term and certainly should be, but only if the data is received at a responsible time. If data is received at the end of May, staff may not be available to do the analysis.

Standards are too high! It will be almost impossible to be accredited. The old standards were a challenge to achieve. Higher standards to assess performance will bring failure. Accountability is for improving programs that are reasonable.

Continuing to add more objectives and goals does not mean effective teaching and learning. We teach all students it is hard for everyone to be at the 50th percentile.

I have concerns about who and how schools and students will be assessed, only on an outcome basis is not a true assessment. The proposed plan will only bring more paper work resulting in less teacher planning, teaching, and evaluating time.

Since most schools have not achieved full accreditation on the old standards, raising them will only cause more failure. Revise these to be reasonable.

Most schools will go on probation if proposed standards go in effect. I don't feel I year is enough time to turn around a school labeled "seriously impaired."

Again, standards proposed are not realistic. Many counties will be labeled with negative feelings resulting about our public school system.

November 15, 1996

Suzy Shifkey
Ashford Rumble
HG64 Box 540
Ashford, WV 25009

December State Board
Part B

Date	Individual/Organization	Comments
November 15, 1996	Pamela White Ashford-Rumble Elementary HC64, Box 540 Ashford, WV 25009	4.1 Standards are too high/unreasonable/unattainable
		4.2 85% may be attainable - standards too high
		4.5 95% promotion rate is too high, this promotes social promotion/90% may be reasonable
		4.7 Allow no exemptions in grades K-6 25 maximum also no exemptions for split-grade classrooms
		4.11 85% too high - Increase each yr. impossible sooner or later you will have a decrease
November 15, 1996	Amy White HC 81 Box 7A Poytona, WV 25154	4.1 standards are too high.
		4.5 Promotion rate is too high and needs to be revised.
		4.7 Exemptions should be eliminated in gr. K-6.
		4.12 60% Parental involvement is too high. Too many work and makes 60% impossible.
November 15, 1996	Nancy L. Justice, Teacher Ashford-Rumble Elementary HC64 Box 540 Ashford WV 25009	4.1 Standards too high
		4.2 Standards too high
		4.5 Promotions - Rate is too high
		4.7 Pupil-teacher ratio
		4.11 Revise or delete - too high
4.12 Parental involvement - too high - Document Parental involvement		
November 15, 1996	Colleen Herald Ashford Rumble Grade School HC64, Box 540 Ashford, WV 25009	4.1, 4.2 appear to high
		4.3, 4.4 ok

Date	Individual/Organization	Comments
November 15, 1996	<p>John W. Rose Associate Superintendent Jefferson Co. Board of Educ. 110 Morrdington Avenue P. O. Box 987 Charles Town, WV 25414</p>	4.5 95% sounds great, but may be unattainable.
		4.6 SDS great.
		4.7 do not allow exemptions.
		4.8 No splits would be better.
		4.9, 4.10 ok
		4.16 ok
		4.1 We need to have high standards, but setting unrealistic goals sets our students and schools up for failure. This leads to low morale and poor performance. There will always be 25% of the students who take a standardized test who will fall into each quartile. I think these goals are unrealistic. This is confusing! Does this address grade level percentiles or total school percentiles?
		4.3 This is a better method but calculate on 7-12 enrollment state-wide. This brings equality to calculations for all secondary schools.
		4.4 Lower graduation rate to 83%.
		4.5 Promotion rate should remain at 92%. Some provision needs to be made to accommodate schools that have the half-step program and to accommodate special education retentions. A promotion rate of 95% is unrealistic if we also expect students to be on grade level by grade four.
4.11 Eliminate until more data on these standards is collected over at least 2 years.		
4.14 Eliminate this item. This is a higher standard than expected in 4.1.		
4.15 Eliminate this item.		
4.16 Clarify this item.		

Date	Individual/Organization	Comments
November 15, 1996	<p>Patricia Hubbard Jefferson County Schools P. O. Box 987 Charles Town, WV 25414</p>	<p>4.1 This needs clarification - are grade level percentiles or total school percentiles being addressed?</p> <p>4.3 Calculate dropout rate on 7 - 12 enrollment. Phase in 6% standard since this will increase initially with an increase in student expectations.</p> <p>4.5 Change promotion rate to mastery rate 95%. To comply, systems will promote students without skills.</p> <p>4.11 Some allowances need to be made for those unable to attend college or work.</p> <p>4.12 Remove - How to measure?</p> <p>4.13 Remove - Unrealistic expectation</p>
November 15, 1996	<p>Wendell Christopher/Principal Burke Street School 422 West Burke Street Martinsburg, WV 25401</p>	<p>4.1 No more than 15% of the students perform within the 1st quartile. I believe in high expectations; however, our school with 92% on free and reduced lunch, cannot compete above the national norm. If we can achieve at the 50th percentile, we would have accomplished a great deal. These standards on a county level may be more realistic.</p>
November 15, 1996	<p>Wetzel County Board of Educ. 333 Foundry Street New Martinsville, WV 26155</p>	<p>4.1 Student test scores - It is not statistically appropriate to designate that fewer than 15% score in the first quartile when, by definition, 25% of students are expected to score in the first quartile.</p> <p>4.2 Student Attendance - Goal is appropriate to promote good attendance, but state needs to revise its attendance policy to permit appropriate consequences when students miss excessive number of days.</p> <p>4.4 Graduation rate - It is not clear how the calculation is to be made. Careful comparisons of current data should be made to ensure that this standard is a reachable one.</p> <p>4.6-4.7 The class size requirement is beyond the requirements of the law. It is ridiculous to prohibit a class size of 23 in a school because of county accreditation standards when the law allows it.</p>

Date	Individual/Organization	Comments
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4.11 Graduates enrolled - The same applies to grades 4-6. It is not appropriate to hold a school system accountable for something totally outside their control.

November 15, 1996
Rebecca Goodwin
Assistant Supt., Instruction

Kanawha County Schools
200 Elizabeth Street
Charleston, WV 25311

The new method of calculating dropouts is more clear to the general public.

4.11 Is difficult to measure and difficult to achieve in counties with high unemployment.

4.12 will require voluminous paperwork. Does one count attendance at school performances?

November 15, 1996

Velinda Phillips
Magnolia High
New Martinsville, WV

4.1 Testing - Too much time is taken out of the school year for testing (Stanford pretest, Life Skills, SAT, PSAT, Vocational Physical Fitness, IEP, P.L.A.N, etc.) Where is the time for consistent, consecutive teaching?

Also the 50% percentile is unrealistic. This is not Lake Wobegon where all the children are above average.

4.3 93% attendance - If the state is going to require 93% attendance, they should formulate an attendance policy with strength to support the counties, and not undermine efforts by counties to enforce good attendance policies.

4.9 95% promotion rate - Promotion should be competency based, not percentage based; based on mastery, not head count.

4.10 Attendance based expenditures - Once again, develop a meaningful attendance policy to help the counties.

November 15, 1996

Franklin Primary School
Faculty Senate
Betty Lou Harris, Chairperson
1305 Washington Pike
Wellsburg, WV 26070

4.7 pupil-teacher ration grades 1-3 (25) - Would like to see this number lowered to 20 students in grades 1-3, especially in first grade. Or provide aides for first and second grades

Date	Individual/Organization	Comments
November 15, 1996	<p>Marsha McDaniel (FACS Teacher) 118 Charles Town Rd. Kearneysville, WV 25430</p>	<p>4.5 Promotion Rate - How can you remediate and still keep up this promotion rate?</p>
November 15, 1996	<p>Mimi Snyder Rt. 1 Box 97 Summit Point, WV 25446</p>	<p>4.5 promotion rate - How can you remediate and still keep up this promotion rate.</p>
November 15, 1996	<p>Berkeley Heights Elem. Faculty Senate Rt. 5, Box 490 Martinsburg, WV 25401</p>	<p>4.2 Where are the incentives to increase student attendance? 4.6 How will this be accomplished in high population growth areas? 4.9 Are there schools now being run by uncertified principals?</p>
November 15, 1996	<p>Cynthia H. Fike 104 Maple Ave. Morgantown, WV 26505</p>	<p>4.5 Promotion Rate - I strongly question the feasibility of this promotion rate providing for inevitable remediation necessities.</p>
November 15, 1996	<p>Jeanne Fawcett 210 Riverside Drive New Martinsville, WV 26155</p>	<p>4.1 Testing - Too much time is taken out of the school year for testing (Stanford protest, Life Skills, SAT, PSAT, Vocational, Physical Fitness, IFF, P.L.A.N, etc.). Where is the time for consistent, consecutive teaching? Also the 50% percentile is unrealistic. This is not Lake Wobegon where all the children are above average.</p>
		<p>4.3 93% attendance - If the state is going to require 93% attendance, they should formulate an attendance policy with strength to support the counties, and not undermine efforts by counties to enforce good attendance policies.</p>
		<p>4.9 95% promotion rate - Promotion should be competency based, not percentage based; based on mastery, not head count.</p>
		<p>4.10 Attendance based expenditures - Once again, develop a meaningful attendance policy to help the counties.</p>

Date	Individual/Organization	Comments
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November 15, 1996
Tracy Mason
Short Line School
Box 328
Reader, WV 26167

As long as percentiles are used, one child must fall at each percentile.
There should not be any exemptions at any grade level.

4.11 How is the school held responsible for employment or post-graduate work?
It is hard to match percentages with percentiles.

November 15, 1996
Lee Ann Williams
RR #2 - Box 315A
Triadelphia, WV 26059

4.15 If it is the 70th percentile, it should be 30% not 33%.

4.5 Promotion Rate - Will we teach only to the test

November 15, 1996

Sandy Weese
Tyler County Schools
P. O. Box 25
Middlebourne, WV 26149

Annual Performance Measures - - Dropout Rate

The proposed student dropout rate is unrealistic. Any county that is below the State average should be commended. The accreditation process should evaluate the effort being made by counties to decrease their dropout. Suggestion - Raise the minimum so that it would be equivalent to the present standard or make a judgment based on whether or not a county's dropout rate is decreasing and based on a county's dropout prevention efforts.

Annual Performance Measures - - Promotion Rate

Increasing the required promotion rate from 92 to 95% in grades K-8 is unrealistic. In addition to reteaching, some may need to spend an additional year at a particular grade level. We should not be penalized for trying to improve students performance and get them functioning on grade level. Suggestion - Do not change the present standard.

Annual Performance Measures - - Parent Involvement

Requiring that the level of parent involvement be at 60% is unrealistic, considering the dramatic changes today in the family structure. Obviously, we have a responsibility to encourage parental involvement, but we cannot mandate it! Suggestion - Schools

Date	Individual/Organization	Comments
November 15, 1996	Robert P. Mason Mineral County Schools One Baker Place Keyser, WV 26726	must be able to verify their efforts to increase parent involvement. Do not try to quantify it. 6% is too low! This should read "the percentage of students seeking advanced education or employment." The current statement does not take into account those persons, particularly young mothers, who wish to stay at home and be a housewife or mother.
November 15, 1996	Musselman Middle School Faculty Senate Rt. 2, Box 149 Bunker Hill, WV 25413	4.3 What if an area's parents overall do not value education, like their do in another area? 4.5 Do we promote even if students haven't mastered skills? 4.12 Schools cannot mandate parent involvement. Get real!
November 15, 1996	Homestead School P. O. Box 158 Dalley, WV 26259	Kindergarten average class is 20 -- Does this mean we no longer have exemptions. Promotion rate 95% K-8 -- Does this mean retentions are to be discouraged?
November 18, 1996	Margaret Kursey Valley View Elem. School Route 4, Box 269 Martinsburg, WV 25401	4.1 This is confusing! Does this address grade level percentiles or total school percentiles? 4.3 This is a better method but calculate on 7-12 enrollment statewide. This brings equality to calculations for all secondary schools. 4.4 Lower graduation rate to 83%. 4.5 Promotion rate should remain at 92%. 4.11 Eliminate until more data on these standards is collected over at least 2 years. 4.14 Eliminate this item. This is a higher standard than expected in 4.1. 4.15 Eliminate this item.

Date	Individual/Organization	Comments
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4.16 Clarify this item.

Date	Individual/Organization	Comments
November 15, 1996	<p>SECTION 5 Pamela White Ashford-Rumble Elementary HC64, Box 540 Ashford, WV 25009</p>	<p>5.1.15 50% too high 5.1.28 Leave as is - no increase 5.6.22 50th percentile too high/eliminate this 5.10.5 Reteach as needed only</p>
November 15, 1996	<p>Amy White HC 81 Box 7A Paytona, WV 25154</p>	<p>5.1.25 50% is too high for P.P.F.T. 5.6.22 Not everyone is average or above average. 50th percentile is too high. 5.10.4 People rise to meet reasonable expectations, however unreasonable expectations causes frustration and failure.</p>
November 15, 1996	<p>Nancy L. Justice, Teacher Ashford-Rumble Elementary HC64 Box 540 Ashford WV 25009</p>	<p>5.1.25 % is too high - especially when we do not have P.E. every day. 5.1.28 Do not increase instructional day! (especially in elementary) 5.2.1 & 5.2.2 Too much paperwork 5.6.7 waste of time and paper 5.6.22 Unrealistic 5.10.5 Reteach occurs as needed</p>
November 15, 1996	<p>Colleen Herald Ashford Rumble Grade School HC64, Box 540 Ashford, WV 25009</p>	<p>5.1 - 5.1.27 sound good 5.1.28 Too much. Instructional time is sufficient. 5.2 - 5.11.6 ok</p>

Date	Individual/Organization	Comments
November 15, 1996	<p>John W. Rose Associate Superintendent Jefferson Co. Board of Educ. 110 Morhington Avenue P. O. Box 987 Charles Town, WV 25414</p>	Section 5 This really should be contained in 2510.
		5.1.8 I do not see the need for this. The Freedom of Information Act already requires government agencies to provide the public with copies of requested policies, lists, etc. Also, is this a new format for program guides?
		5.1.15 Who will pay for tutoring of students not achieving mastery. Is this another unfunded mandate?
		5.1.18 "conduct daily or equivalent"
		5.1.25 Eliminate - not attainable - no 2510 standard.
		5.1.19 This needs to be postponed until 1998-1999 to give counties time to develop programs of study.
		5.1.21 Postpone until 1998-1999.
		5.1.22 Postpone until 1998-1999.
		5.1.24 Postpone until 1998-1999.
		5.1.26 Postpone until 1998-1999. Delayed beyond 1997-1998. Cover grades 9 to 12 not 11 to 12.
5.1.28 School systems with separate bus routes for elementary and secondary students will have a thirty minute increase in the beginning and ending times for students. Busses will be running in the dark in winter. Allow waiver as needed due to travel times.		
5.10.6 The state aid formula needs to be revised to provide one counselor per 200 students.		
November 15, 1996	<p>Patricia Hubbard Jefferson County Schools P. O. Box 987 Charles Town, WV 25414</p>	5.1.18 Career exploration data should be moved from fall 1997 to 1998. Core daily requirements do not allow for alternative scheduling. Add life skills classes to be offered.
		5.1.19 Add supporting electives in family and consumer sciences to be provided, keep applied arts and the arts.

December State Board
Part B

Date	Individual/Organization	Comments
5.1.22		Change effective date from 1997-98 to 1998-99.
5.1.24		Change effective date from 1997-98 to 1998-99.
5.1.25		Remove standard for physical fitness test - student's are being remediated instead of going to P.E. This is an unrealistic expectation. No standard in 2510.
5.1.26		Change effective date from 1997-98 to 1998-99 and grades 11-12 to grades 9-12.
November 15, 1996	Wendell Christopher/Principial Burke Street School 422 West Burke Street Martinsburg, WV 25401	An instructional day is provided that includes a minimum of 330 minutes for kindergarten and grades 1 through 4, 345 minutes for grades 5 through 8, and 360 minutes for grades 9 through 12. - Increasing the day for younger children is not going to accomplish anything. Their day is already stretching their attention span. They do not have the energy to increase their time on task in an efficient manner. (Point of diminishing return.)
November 15, 1996	Kathy L. Wiley Rt. 10 Box 17 Morgantown, WV 26505	Where do consumer and home making classes fit into these new policies? Adult Roles, STEPS, and Parenting are Life Skill classes. These classes will affect students lives regardless of their career choices. We all need skills to be wise shoppers and financial planners whether we are CEO's or day care aides. We all need to learn Adult Roles - everyone would like to see the family strengthened but here we are striking out the one curriculum with the family at its core. Life Skills - decision making, critical thinking, financial planning, family values, teamwork, hands on curriculum, child development, parenting. Projects to raise the awareness of child abuse, family communication skills, health needs, AIDS, Drug Abuse and the importance of good choices have always been an important part of the Family and Consumer Science Curriculum.
November 15, 1996	Weitzel County Board of Educ. 333 Foundry Street New Martinsville, WV 26155	5.1.2 How will this be measured? 5.1.5 We agree that work-based learning experiences are important. How will one be able to tell if increases or decreases in student achievement are attributed to that program? 5.1.15 Who will pay for the reteaching component? We agree it is important, but shouldn't be held accountable if there are no funds to pay for it.

Date	Individual/Organization	Comments
November 15, 1996	Rebecca Goodwin Assistant Supt., Instruction Kanawha County Schools 200 Elizabeth Street Charleston, WV 25311	<p>5.1.15 Required tutorial services are an unfunded mandate.</p> <p>5.1.17, 5.1.18, and 5.1.19 - should be the equivalent of daily to permit block scheduling or thematic units.</p> <p>5.2.1 Is a bureaucratic nightmare -- paperwork, paperwork, etc.</p> <p>5.6.20 Is important. This should be substituted for 5.2.1.</p> <p>5.10.9 & 5.10.10 should be principal, vice principal or supervisor. One person cannot do this in a large school.</p> <p>5.6.10 Is more bureaucratic nonsense. This should be a local decision as long as the district is able to demonstrate community involvement.</p>
November 15, 1996	Vellinda Phillips Magnolia High New Martinsville, WV	<p>5.18 Program guides available - Define program guides. This is vague and seems useless. What is the intent of this?</p> <p>5.19 Co-curricular and extra-curricular programs outside school hours. - This is not good. It will reduce student opportunities.</p> <p>5.1.26 Full year of work based experience. - <u>Meaningful</u> work is impossible to find for many students in a rural state. Where will staff and funds come from to find work placement, monitor students, etc.?</p> <p>5.1.25 50% increase in passing President's Fitness test is excessive.</p> <p>5.25 Faculty Senate funds - Do Guidance Counselors receive funds, too?</p> <p>5.6.11 & 5.6.12 - These two items are badly out of logical order.</p>

Date	Individual/Organization	Comments
November 15, 1996	Franklin Primary School Faculty Senate Betty Lou Harris, Chairperson 1305 Washington Pike Wellsburg, WV 26070	<p>FISCAL CONCERNS: These are mandates without funding. With teacher/pupil ratios and added demands, where will additional staff be found and how will they be funded? Do not make requirements without funding them.</p> <p>These lofty goals are admirable, but unrealistic. They are utopian, rather than reasonable. Yes, we should aim high, but we should also remain in touch with reality.</p>
November 15, 1996	Marsha McDaniel (FACS Teacher) 118 Charles Town Rd. Kearneysville, WV 25430	<p>Section 5 - Many based on Policy 2510--see comments Previous 2.1.25 Why eliminate chorus and instructional music in 6-8 grades? 5.10.2 Unified School Improvement Plan 5.6.9 Steering Committee for County - These programs are important to Middle Schools. Why is plan needed? Why? Time and funding? A lot of emphases on core subjects but the fine arts, science, etc. are still needed.</p>
November 15, 1996	Mimi Snyder Rt 1 Box 97 Summit Point, WV 25446	<p>5.1 Real value is provided by clubs, activities, and assemblies. Don't eliminate chances for these.</p> <p>5.1.18 Life skills and career readiness are offered through cooperate learning experiences that focus not on the primary skills taught but also includes time management skills, or organizational skills, safety awareness, and working with others, which is necessary regardless of career choice. Leadership skills are taught through our youth organization - Future Homemakers of America.</p>
November 15, 1996	Berkeley Heights Elem. Faculty Senate Rt. 5, Box 490 Martinsburg, WV 25401	<p>5.1.18 developmental guidance/life skills. Especially good for self-esteem & team development. Add: supporting elective important to all career paths.</p> <p>5.1.19 Some real value is provided by clubs & assemblies. Don't eliminate chance for this.</p>
November 15, 1996	Berkeley Heights Elem. Faculty Senate Rt. 5, Box 490 Martinsburg, WV 25401	<p>5.1.6 get rid of open classrooms.</p> <p>5.1.17 "Required in grades K-4" should be replaced. % 1.18- same as 5.1.17.</p> <p>5.1.28 should not be stricken.</p> <p>5.4 should be not be stricken.</p>

Date	Individual/Organization	Comments
November 15, 1996	Cynthia H. Fike 104 Maple Ave. Morgantown, WV 26505	5.6.2 wording should be more precise. 5.6.3 Community resources should not be stricken. 5.6.10 What is it? Explain. 5.6.14 What about a permanent sub? 5.6.13 should not be stricken.
November 15, 1996	Joanne Fawcett 210 Riverside Drive New Martinsville, WV 26155	5.6.17 How long is the lunch period? 5.6.21 What standards constitute proficiency? 5.6.23 What happens to LD and other Sp. Ed. Students who won't make it?
November 15, 1996	Cynthia H. Fike 104 Maple Ave. Morgantown, WV 26505	5.1.25 I implore you not to strike any of these courses from the list of available electives. They not only teach practical life skills which frequently are not being taught at home, but also provide training in such job-related skills as organization/time management, safety, and appropriate interpersonal behavior. Societal pressures are increasingly stressful for families/wage earners. As such, these electives are essential to success at home and on the job.
November 15, 1996	Joanne Fawcett 210 Riverside Drive New Martinsville, WV 26155	5.18 Program guides available - Define program guides. This is vague and seems useless. What is the intent of this? 5.19 Co-curricular and extra-curricular programs outside school hours. - This is not good. It will reduce student opportunities.
November 15, 1996	Joanne Fawcett 210 Riverside Drive New Martinsville, WV 26155	5.1.26 Full year of work based experience. - Meaningful work is impossible to find for many students in a rural state. Where will staff and funds come from to find work placement, monitor students, etc.? 5.1.25 50% Increase in passing President's Fitness test is excessive. 5.25 Faculty Senate funds - Do Guidance Counselors receive funds, too?

Date	Individual/Organization	Comments
November 15, 1996	<p>Tracy Mason Short Line School Box 328 Reader, WV 26167</p>	<p>5.6.11 & 5.6.12 - These two items are badly out of logical order.</p> <p>FISCAL CONCERNS: These are mandates without funding. With teacher/pupil ratios and added demands, where will additional staff be found and how will they be funded? Do not make requirements without funding them.</p> <p>These lofty goals are admirable, but unrealistic. They are utopian, rather than reasonable. Yes, we should aim high, but we should also remain in touch with reality.</p> <p>5.1.14 More money needs to be provided for curriculum textbooks.</p> <p>We have 0 tolerance, but how do we prevent it from happening?</p> <p>5.1.28 The instructional day is long enough especially in those countries that run buses on a High School schedule.</p> <p>5.6.4 Staff members will provide parents with information when asked.</p> <p>5.6.23 How do children reach the 50th percentile in reading if reading is not a required subject in 7-8 grades.</p> <p>5.10.10 That does not follow current evaluation policy.</p> <p>5.10.13 Where's the time? More employment time or less instructional time?</p> <p>5.11.3 We need the threat of corporal punishment.</p>
November 15, 1996	<p>Lee Ann Williams RR #2 - Box 315A Triadelphia, WV 26059</p>	<p>5.1.18-5.1.19 Add: Life Skills and Career Readiness Add: Supportive Electives</p> <p>We need curriculum that teach skills that effect families</p> <p>Life skills and career readiness and taught in Family and Consumer Science.</p>

Date	Individual/Organization	Comments
November 15, 1996	Robert P. Mason Mineral County Schools One Baker Place Keyser, WV 26726	<p>5.1.18 "Daily" eliminates the possibility of block scheduling for science and soc. st.</p> <p>5.1.25 NO!</p> <p>5.1.26 Grades 9-12</p> <p>5.1.28 Eliminate the additional 15 Minutes</p> <p>5.5.2 "Adequate" is entirely subject to an individual person's opinion, and has no place in an accountability process. There should be written standards to refer to.</p> <p>5.6.23 Warranty for post-secondary education - NO! This implies only 30% of students will be prepared to attend college!</p> <p>5.10.7 Awkward wording</p>
November 15, 1996	Musselman Middle School Faculty Senate Rt. 2, Box 119 Bunker Hill, WV 25413	<p>5.10.10 With all observations required of new teachers and staff, it is difficult to observe every teacher once a semester. Once a year is more feasible.</p> <p>5.1.15 During class time or after school?</p> <p>5.1.4 What happens when high performance expectations are set beyond abilities of students who are slow learners? Do we modify the curriculum to assure success and maintain accreditation?</p> <p>5.1.16 Why is reading not a core class?</p> <p>5.9.2 What criteria will be used to evaluate personnel for improvement of job performance?</p> <p>5.10.10 Will beginning teachers be observed <u>once</u> each semester?</p>
November 15, 1996	Homestead School P. O. Box 158 Dalley, WV 26259	<p>Re-teach in same day -- Need variety in daily schedule, re-teach within the week.</p> <p>Transitional 1st - transportation -- Trans. 1st need to be a each school</p> <p>Principal view lesson plans -- needs to be weekly basis.</p>

Date	Individual/Organization	Comments
5.1.15		Reteaching - tutorial services - I can understand reteaching in the classroom - but is to do the tutorial and when?
5.1.18		Reading - deleted - Reading will no longer be taught in grades 5-8?
5.1.25		Deleted - Music include choral and band? Alternative Education for only disruptive students or for students who have difficulty meeting grade requirements and don't qualify for Special Education?
5.1.16		Reteaching language arts, and mathematics same day - This could be boring for students.
5.1.25		50% of students will pass presidential physical fitness test - Are we going to educate parents too who don't encourage kids to do sports, or physical activity and don't eat right.
5.1.21	Lincoln County Board of Edu. Donna Martin, Ass't. Supt. 10 Marland Avenue Hamlin, WV 25523	Core and non-core electives - refer back to Chart IV-A In Policy 2510 - - what are core and non-core electives? Only core electives (Chart IV-A are listed in Policy 2510. I am assuming that non-core electives are those in subjects other than L.A., Math, Science & Soc. St. Must any non-core electives be offered? Do non-started elective courses on chart IV-A have to be offered?
5.1.26		Work-based learning experiences - Are these work-based experiences to last a year or "during one year"? Language is confusing.
5.1.18	Margaret Kursey Valley View Elem. School Route 4, Box 269 Martinsburg, WV 25401	"conduct daily or equivalent"
5.1.25		Eliminate - not attainable - no 2510 standard.
5.1.26		Delayed beyond 1997-98. Cover grades 9 to 12 not 11 to 12.
5.1.28		Allow waivers as needed due to travel times.
5.6.23		Eliminate 70% He warranty.
5.7.2		Incorrect. All board members must receive 7 hours annually.

Date	Individual/Organization	Comments
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5.7.3 Incorrect. Every newly elected member must receive orientation.

5.9.5 Eliminate this requirement. What is leadership?

5.10.12 Eliminate

Date	Individual/Organization	Comments
November 15, 1996	Colleen Herald Ashford Rumble Grade School HC64, Box 540 Ashford, WV 25009	SECTION 6 Section 6.0k
November 15, 1996	John W. Rose Associate Superintendent Jefferson Co. Board of Educ. 110 Mordington Avenue P. O. Box 987 Charles Town, WV 25414	6.1 Postpone until July 1, 1998. 6.2 Postpone until July 1, 1998.
November 15, 1996	Patricia Hubbard Jefferson County Schools P. O. Box 987 Charles Town, WV 25414	6.1 Delay effective date for Unified Improvement Plan due on November 1997 to July 1, 1998
November 15, 1996	Rebecca Goodwin Assistant Supt., Instruction Kanawha County Schools 200 Elizabeth Street Charleston, WV 25311	6.4 Add the word "intentional" before falsification.
November 15, 1996	Franklin Primary School Faculty Senate Betty Lou Harris, Chairperson 1305 Washington Pike Wellshurg, WV 26070	6.1 This should only refer to the last clause - "outlines plans for meeting high quality standards and performance measures that have not been met." Anything else is too comprehensive and will be a paperwork nightmare.
November 15, 1996	Berkeley Heights Elem. Faculty Senate Rt. 5, Box 490 Martinsburg, WV 25401	6.2 Whose standards? Will these be equal across the state? Section 6 - Process seems to be moving along too quickly. Why the haste to implement some sections by summer or fall of 1997? - This seems like more work for already overworked professionals who spend many hours on committee at present.

Date	Individual/Organization	Comments
November 15, 1996	Tracy Mason Short Line School Box 328 Reader, WV 26167	6.1-6.2 All agencies need to accept the same forms.
November 15, 1996	Lee Ann Williams RR #2 - Box 315A Triadelphia, WV 26059	Section 6 Why teach foreign language if we can't raise our own children.
November 15, 1996	Robert P. Mason Mineral County Schools One Baker Place Keyser, WV 26726	6.4 Add "intentional" before falsification.
November 15, 1996	Homestead School P. O. Box 158 Dalley, WV 26259	County warrantly seal stamp or symbol awarded all graduating seniors - - are they warranted to go to college and do well or get a job. I'm not sure what this means.
November 18, 1996	Margaret Kursey Valley View Elem. School Route 4, Box 269 Martinsburg, WV 25401	6.4 Intentional falsification

Date	Individual/Organization	Comments
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SECTION 7
7.1 increase time from 1 yr to 3 yrs for a school to get off probation

Pamela White
Ashford-Rumble Elementary
HC64, Box 540
Ashford, WV 25009

November 15, 1996

Section 7 - No comment

Franklin Primary School
Faculty Senate
Betty Lou Harris, Chairperson
1305 Washington Pike
Wellsburg, WV 26070

November 15, 1996

7.2 What determines "high quality"? Are there nat. guidelines that determine quality?
7.3.17.4 What would keep a school from "fixing" the tests to avoid probation?

Berkeley Heights Elem.
Faculty Senate
Rt. 5, Box 490
Martinsburg, WV 25401

November 15, 1996

7.3.1 It is an unfair process unless there are exact measures for schools to meet.

Tracy Mason
Short Line School
Box 328
Reador, WV 26167

November 15, 1996

7.4 This statement needs almost the same as 7.3, "where the measure(s) of the school's performance is below established standards and performance measures." ????

Robert P. Mason
Mineral County Schools
One Baker Place
Keyser, WV 26726

November 15, 1996

Date	Individual/Organization	Comments
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November 15, 1996

Pamela White
Ashford-Rumble Elementary
HG64, Box 540
Ashford, WV 25009

SECTION 8

8.1 30th percentile for 3 yrs in a row - not yearly

8.2 at or below 80% for 3 yrs in a row - not yearly

8.3 9% too high

8.4 3 consecutive years - not yearly

8.5 too broad

8.5.3 3 yrs instead of 1 yr

November 15, 1996

Amy White
HG 81 Box 7A
Peytona, WV 25154

8.4 Accreditation should be done on a 3 year basis and not yearly.

8.5.4 If these standards pass, many schools will be on probation. The schools should not be responsible to pay if a student transfers.

November 15, 1996

Nancy L. Justice, Teacher
Ashford-Rumble Elementary
HG64 Box 540
Ashford WV 25009

8.1 Revise or delete - 3yrs in a row

8.2 not yearly

8.5 Define Extra ordinary

8.5.4 Revise to cover schools labeled seriously impaired - Transfers should not be at county's expense

November 15, 1996

Franklin Primary School
Faculty Senate
Betty Lou Harris, Chairperson
1305 Washington Pike
Wellsburg, WV 26070

Section 8 - Section seems well done. - Hopefully, this is not totally determined by test scores. Accreditation needs to be determined by many factors and just on one limited area such as test scores.

December State Board
Part B

Date	Individual/Organization	Comments
November 15, 1996	Berkeley Heights Elem. Faculty Senate Rt. 5, Box 490 Martinsburg, WV 25401	<p>8.1 What if there are a lot of slow learners due to low S.E.S. area that the school is in?</p> <p>8.4 student dropout is hard to control and students still in school should not be penalized.</p> <p>8.5.1 Who makes up the team? Are they educators?</p> <p>8.5.2 What people make up a panel to decides whether a school is "high quality".</p>
November 15, 1996	Robert P. Mason Mineral County Schools One Baker Place Keyser, WV 25726	<p>8.3 9% is too low to be accredited as seriously impaired!!!!</p>

Date	Individual/Organization	Comments
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November 15, 1996

Franklin Primary School
Faculty Senate
Betty Lou Harris, Chairperson
1305 Washington Pike
Wellsburg, WV 26070

SECTION 9
Section 9 - No comment

November 15, 1996

Berkeley Heights Elem.
Faculty Senate
Rt. 5, Box 490
Marlinsburg, WV 25401

9.3 What is "high quality"?

9.6 What happens to the students in these schools.

9.6.1 It seems that the students in these schools are hurt if funds are cut. The Board is good at finding impairment, but nothing to help the at-risk schools.

November 15, 1996

Robert P. Mason
Mineral County Schools
One Baker Place
Keyser, WV 26726

9.5 Nonapproval status based on improving a probationary rating within one year should be based on the particular standard involved.

December State Board
Part B

Date	Individual/Organization	Comments
November 15, 1996	<p>SECTION 10 Pamela White Ashford-Rumble Elementary HC64, Box 540 Ashford, WV 25009</p>	<p>10.7 delete standard 1 use improperly by media-public-parents 10.9 use random selection process</p>
November 15, 1996	<p>Nancy L. Justice, Teacher Ashford-Rumble Elementary HC64 Box 540 Ashford WV 25009</p>	<p>10.7 Info. confidential & should stay that way.</p>
November 15, 1996	<p>Franklin Primary School Faculty Senate Betty Lou Harris, Chairperson 1385 Washington Pike Wellsburg, WV 26070</p>	<p>Section 10 - No comment</p>
November 15, 1996	<p>Berkeley Heights Elem. Faculty Senate Rt. 5, Box 490 Martinsburg, WV 25401</p>	<p>10.3 To what degree of inclusion? 10.3.2 Not fair! Too much power given to an on-site team. 10.3.3 Smells like merit pay! Not</p>

Date	Individual/Organization	Comments
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November 15, 1996

Robert P. Mason
Mineral County Schools
One Baker Place
Keyser, WV 26726

SECTION 13

13.9 The title of this section should be "County Accreditation Status," to be parallel with section 13.7.

Date	Individual/Organization	Comments
November 15, 1996	<p>Derby Hammond Title I Reading Specialist Jefferson County Schools P. O. Box 987 Charles Town, WV 25414</p>	<p>The many policies that have been written for West Virginia Schools reflect the need for our education system to support the growth and development of individuals in order for them to meet the needs of our ever-changing world and work force. It seems as though these policies will enable the school systems to create and work within the parameters of the students' needs and continue to support and nurture students towards meeting their individual goals...whether it be post-secondary education, specialized training in a particular career, or a warranted high school diploma.</p> <p>It concerns me though that the philosophy of the policies states that students should not have time as a constant, but should be able to grow and develop in the time that is needed for them individually; yet, in most of the policies there is a direct conflict of this philosophy. I hope that the board will consider this point carefully, and stick to their original beliefs and allow the wording to support this.</p> <p>Also, as an educator, I believe strongly that implementation of these policies is critical, but, in order to be effective and confident through the transition period, I feel that the time lines stated in many of the policies needs to be extended to the school year 1998 - 1999. If we hurry on the implementation, we will lose the key ingredient...effectiveness. If the board truly believes in these policies, then they need to allow the counties time to learn the policies so that the implementation is understood. It sort of goes along with an old educational saying... "We can talk the talk, but we need to walk the talk also!" It takes time to read through the policies and relate them to programs already in place, thus to plan strategically where the next step must be and how to take that step effectively.</p> <p>Please take in to consideration these points when you finalize these policies</p>
November 15, 1996	<p>Brenda Gibbs, Coordinator Special Education Jefferson County Schools P. O. Box 987 Charles Town, WV 25414</p>	<p>I feel that the state goals and the policies to ensure achievement are good for education in West Virginia. Ideally these goals are where we need to be. However, it is ludicrous to believe that the first goal (All children entering the first grade will be ready for the first grade) will ever be achieved without state funding. Pre-school classes are not funded by most West Virginia public school systems and the majority of existing other-funded pre-school programs serve only a small portion of the eligible population. In addition, since children "bloom" at different times, do we postpone promotion until a child is ready to begin first grade.</p> <p>The policies also disregard the philosophy of developmental levels of young children in other ways. Policy 2520 should be re-vamped. Readiness should be added to Kindergarten. K11, K19,</p>

Date	Individual/Organization	Comments
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K24, K25, K26, K54, K57, K58 and K59 are not developmentally appropriate and should be deleted. 1.101, 1.102, 1.109, 1.23, 1.27 and 1.28 should also be re-examined for the same reason.

Policies 2320 (4.1, 4.5, 5.115) and 2510 (5.23, 6.3.1) also need revision. If 95% of students are to be promoted yearly and our drop out rate is to be below 6%, how can we provide for students who need additional time to master concepts and skills? School systems can't offer Half Step, ungraded or multi-age classes to address developmental levels and all children are assessed by age level tests not performance or developmental level tests. In addition, the elimination of art, music and P. E. classes cheats students of important subjects and possibly forces reteaching and drill of skills which the students are not developmentally ready to acquire or understand. These policies do not allow TIME for students to develop. They seem to mandate that all students will learn the same material in the same time frame.

Generally, ALL of the implementation dates in ALL of the policies must be extended for a minimum of one year if school systems are to seriously revamp existing programs.

Also generally, I support the idea of changing the curriculum to reflect the assessment instrument. Until our curriculum matches the national expectations, West Virginia students will appear to be less well educated. But we must test when students are ready.

The Faculty-Senate of Springfield Green Spring Elementary School believes that creating a law that raises the expectations of 50% of students in grades 3-11 is a threat to teachers who teach "slow" or "at risk" students. We teach struggling students who learn very slowly. We do not believe raising expectations will raise their scores above the 50th percentile. The national average for students entering kindergarten with a language deficit is 10%, 40% of our students enter with a language deficit. We do not need uniform laws and standards because our students are not uniformly matched to the national average. Instead of higher expectations we need real help. We need aides in grades 1 and 2. We need a full time language/speech therapist. We have one whose case load is 60 instead of 40. We need another Title I teacher, 52% of our students in grades 1, 2 and 3 are in Title I. Grades 4, 5 and 6's needs are ignored.

We need a pre-school program for 4 year olds. Our children need intense instruction in a print and language rich environment in their early years.

These are REAL solutions to REAL problems. If you would meet our teachers working with determination and patience you would realize that it takes expert teachers to teach children with lower IQ's and low self-esteem. Anyone can teach smart children. Teachers who work with

November 15, 1996
Faculty-Senate
Springfield-Green Spring El.
P. O. Box 309
Springfield, WV 26763

December State Board
Part B

Date	Individual/Organization	Comments
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"at risk for failure" students don't get support from home. We need support in the form of additional personnel and a pre-school program.

It is unfair to expect equal results from unequal readiness scores. Give us help not a new law that isn't realistic.

November 15, 1996

Thomas C. Denne, Ph.D.
Coordinator of Psychological
Services
Mineral County Schools
Psychological Services
Mineral Street Annex
39 South Mineral Street
Keyser, WV 26726

For several months during late 1995 and 1996, I had the privilege to serve on the W. Va. Test Advisory Council and the Test Selection Steering Committee.

My compliments are extended to the State Department of Education leaders who worked tirelessly in coordinating the Committee efforts.

In December of 1995, at the Pope John XXIII Conference Center, I was extremely hopeful that the Committee would design an assessment instrument that would incorporate: the unrealized, practical, criterion referenced utility of WVSTEP; the norm referenced comparative statistical usefulness of CTES/4; and the performance based, holistic, criterion oriented productivity of the Writing Assessment Program.

Financial constraints NOT educational disagreement prevented "The Committee" from designing THE West Virginia Model Test Instrument! Instead of dictating to test publishers what we, in West Virginia, determined to be our vital curricular issues, we were stuck with selecting the best commercially available test instrument and adopting their objectives as our curricular priorities.

Given the financial reality of the situation, we, on the various committees, did our best. We really did!

Clearly, the Stanford 9 was the best prepackaged instrument available!

I appreciate the time and effort that educational leaders and legislators dedicated to the formulation of the accountability component of Senate Bill 309. I recognize that the public has a legitimate need to know how we in the educational system are doing in providing a competent basic skills education for West Virginia children!

I do, however, have great reservations about the manner in which accountability will be assessed under Policy 2340 and especially Policy 2320.

Date	Individual/Organization	Comments
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I believe in high expectations! I believe that all children can learn! I believe in the value of a West Virginia public education!

I do not believe in the deceptive, overemphasis on a norm referred standardized achievement measure as the student performance accountability tool. Polley 2340, 13S-13-5.6.23 in establishing the fifth percentile as the statewide lower level. Warranty minimum does a disservice, statistically, to students. Statistically the term "average" includes that portion of the normally distributed population that is within one standard deviation of the mean. A fifth percentile standard excludes approximately half of the average range (that portion between one standard deviation below the mean up to the mean itself). This large chunk of students, while still average, would all heretofore be excluded from Warranty. By eliminating such a large portion of the average range, we are excluding from Warranty consideration a large number of average, normal, competent students.

Some may make the argument that our academic interventions justify using the fifth percentile as the minimum Warranty level. This argument suggests that our educational/instructional interventions are sufficient to allow us to abandon statistical normality in our reasoning. If our educational interventions are sufficient to make our student population skewed (not normal), then, I suggest we should not be adhering to the same statistical criteria used by the norm group on which the SAT/9 was standardized. To do so only serves as possible public relations without statistically credibility.

Further, I contend that Polley 2320, 12S-13-4.1 is even more statistically inappropriate than the prior Warranty example, just cited. We will all be "High Average" and those of our children who are struggling, will "struggle less" each year. What was the percentage of special education students included in the SAT/9 standardization group? What were the severity levels of student handicaps? How do the answers to the prior questions compare with state/county special educational data?

Are we suggesting that special education students won't be handicapped anymore now that everyone else is "High Average"? Or are we suggesting that our educational interventions will be sufficient to make special education students appear to be no longer handicapped on the SAT/9? If the latter is what we are suggesting, it is inappropriate to compare our students to the norm group on which the Stanford 9 was standardized. The norm group did not have the benefit of our interventions prior to taking the test for standardization purposes.

There are many unresolved issues/questions regarding the appropriate inclusion of special education students in the SAT/9 process. Dr. Michael Valentine's 9-10-96 on the inclusion of special education students in the accountability system may be a reasonable first step in

December State Board
Part B

Date	Individual/Organization	Comments
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clarifying some of these issues. However, I fear that we are not close to being able to equitably implement his memo, given the complexity of the issues and the significance of their impact on system wide accountability.

In December, we had high hopes of designing a West Virginia Assessment Device that all of use would be proud of --a device that would allow student performance to be assessed against various standards that we as proud West Virginia educators, determined to be appropriate. Instead, we settled for a very good norm referenced standardized assessment tool -- a useful tool but not the all inclusive ideal instrument that we had hoped for. Let's not overdo accountability by pretending that we have an assessment tool that even approaches what we had hoped to have on that cold morning in December, 1995!

In the name of accountability, we cannot submit the children of West Virginia, its educators, and its various publics to a system that screams of statistical inappropriateness.

P. S. My compliments to all of those State Department educators who worked tirelessly to produce the four part Components described in the Background Section of the Executive Summary - Regulations for Statewide Assessment Program - Policy 2340.

While naming names is dangerous as I am sure that I will miss someone, Keith Smith, Terry Wilson, Karen Nicholson, and Jan Barth demonstrated dedication, flexibility, determination, optimism in the face of adversity, and, especially congeniality in working through this challenging Test Selection Process. Also, Larry Jones was an excellent, knowledgeable Committee Chairperson.

The Components are reasonable, given the constraints that we worked under. The results of our efforts are also reasonable.

I, obviously, have great reservations about implementation/accountability components.

Mrs. Cleo P. Mathews, President, WV State Board of Education -- On behalf of the members of the Tyler County Board of Education, I am writing directly to you to make an appeal to postpone Board action on the draft State Board Policy 251- and Policy 2320. At this time, we are merely requesting a postponement in order to allow more time to study and comment on the proposed changes.

These revised policies will have a dramatic impact on county school systems, particularly in

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November 15, 1996
Sandy M. Woese, Supt.
Tyler County Schools
P. O. Box 25
Middlebourne, WV 26149

relation to personnel needs and course requirements. We believe that successful implementation will require changes in certain State laws. Also, some of the timeliness are unrealistic and a few of the performance standards seem to be unattainable.

Attached is a list of specific concerns expressed by our Board members, administrative staff, Teacher Advisory Council, and Parent Advisory Council. Written comments have also been submitted to the appropriate State Department personnel.

The position of the Tyler County Board of Education has always been that teachers must set high expectations for their students. It is obvious that the same philosophy is the central theme of all the proposed State Board policies. However, we believe that educators must also set benchmarks that are realistic and achievable. This is the main concern we have with Policy 2510 and Policy 2320.

Please give us ample opportunity to try to change some of the provisions that we feel are not in the best interest of students. The end result will be sort of documents which reflect high academic standards that can be achieved through hard work, adequate financial aid, and creative solutions.

Thank you for your consideration for a time extension.

I am writing in reference to your expectation that all students will have to have three mathematics credits to graduate. According to your interpretation of Senate Bill 300, this will include at least Algebra I and Geometry plus an additional mathematics course. As a middle school mathematics educator, I am concerned that this goal may not be realistic.

First of all, the goal of reducing the dropout rate to 6 percent is a wonderful concept. However, I

December State Board
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November 15, 1986

Mrs. Patricia Egbert
Wirt County Middle School
P. O. Box 639
Elizabeth, WV 26160

am afraid that the math anxiety that children face in today's world will only be heightened by forcing academic work upon them which they may not be ready to attempt. Can the Consumer Math and Business Math classes not benefit the students enough, especially those that do not plan to continue with college? As a teacher, I see the need for students to attain higher levels of achievement in mathematics and science, but at what cost are we willing to go to attain this?

Secondly, if students must take time for remediation, I am concerned that when students get off track due to remedial activities that their desire to work in class and even stay in school will be adversely affected. While these goals are outstanding, I am not sure that the time constraints and limited resources are being considered in the implementation of this plan.

As a visual learner, I would like to see several alternate plans outlined which would take into account students at various levels of aptitude. I understand that if the implementation of Senate Bill 300 is to be successful, barriers such as these must be overcome in the beginning.

Date	Individual/Organization	Comments
Section 4 - Annual Performance Measures		
11/15/96	Lynn Palmer Gibon School 1905 Parkwood Drive Parkersburg, WV 26104	Requiring a 95% promotion rate and students to be on grade level by grade 4 is unrealistic. There are factors beyond the control of schools that influence this. We should always try to do all we can for students - but realize we can't do it ALL.
11/15/96	Janice Kirk Gibon 1st grade teacher 2406 Oak St. Parkersburg, WV 26101	I feel it would be erroneous to expect all children to develop at the same rate. M factors contribute to a success in school; # of single parent families, socio-economics, poor nutrition, developmental delays.
11/15/96	Saralie Sheets Rt. 2, Box 51-2 Walker, WV 26180	Why such a high promotion rate? When reteaching doesn't work other factors must be considered (i.e., broken homes, adhd, developmental differences, social-economic background, learning disabilities). This will increase dropouts!
11/15/96	Mike Burke Mineral County BOE 1 Baker Place Keyser, WV 26726	Complicated/2 ways to fail = AND make some exception for small - small schools where small numbers impact percentiles.
11/15/96	Patricia S. Harrison, Parent, Jefferson County FACS Board Member 215 Tuscarilla Hills Charles Town, WV 25414 Cheryl H. Ornick 109 Wilson Avenue Morgantown, WV 26505 Marlyn S. Bisher 12 Heritage Dr. Shepherdstown, WV 25443	4.5 Promotion Rate - How can you remediate and still keep up this promotion rate?
11/15/96	Sandra Phillips 600 Academy St. Ronceverte, WV 24970	4.5 Students have different rates of maturation and may need additional instructional time, especially in kindergarten and first grade.

Date	Individual/Organization	Comments
Section 4 - Annual Performance Measures (Continued)		
11/18/96	Joe McClung, Principal Meadow Bridge High School PO Box 1D Meadow Bridge, WV 25976	4.1 50% of students at or above 3rd quartile is reasonable. 15% in 1st quartile is questionable.
		4.2 Realistic?
		4.3 Thank you - finally makes sense!
		4.4 Controlled more by economy than any thing else!
11/18/96	Dave Cooper, Principal 207 Bryan Street Petersburg, WV 26847	4.14 May not be completely realistic! I feel strongly that there should not be a promotion quota. If high standards are to be adhered to, a student should not be promoted until ready. There are plenty of other students to compensate for this one.
11/18/96	Lavena Jane Higginbotham Elizabeth Beale William Abercgg Nettie Herrick Magnolia High School 601 Maple Avenue New Martinsville, WV 26155	4.1 Testing - Too much time is taken out of the school year for testing (Stanford, Stanford Pretest, Life Skills, SAT, PSAT, Vocational, Physical Fitness, IEP, P.L.A.N., Etc.) Where is the time for consistent, consecutive teaching? Also, the 50% percentile is unrealistic. This is not Lake Wobegon where all the children are above ave. 4.3 93% attendance - If the state is going to require 93% attendance, they should formulate an attendance policy with strength to support the counties, and not undermine efforts by counties to enforce good attendance policies. 4.9 Promotion should be competency based, not percentage based, based on mastery, not head count. 4.10 Attendance based expenditure - Once again develop a meaningful attendance policy to help the counties.

Date	Individual/Organization	Comments
Section 4 - Annual Performance Measures (Continued)		
11/18/96	Harold D. Garber, Superintendent Grant County Schools 204 Jefferson Avenue Petersburg, WV 26847	4.1 Wording is difficult to understand. 4.3 Based on Grades 7-12 or 9-12? 4.5 Take K out completely and change to 90% 4.11 More data needs to be collected before standards are set.
11/18/96	Donna Z. Heuneman Executive Director, WV Developmental Disabilities Planning Council 110 Stockton St. Charleston, WV 25312	<p>The 50% at or above 3rd quartile in total basic skills is a good goal for which to strive. The DD Planning Council is concerned that students with developmental disabilities will not be expected to meet the same standards; hence will not be provided the supports and accommodations necessary for their success. Additionally, those students with the most significant disabilities are unlikely to meet the minimum requirements. Rather than exempt them entirely through the IEP process, would some type of alternative be available to better fit their curriculum?</p> <p>The dropout rate for students with disabilities is significantly higher than with other population groups. What specific measures are contemplated to address this issue relative to the requirements of this section for drop-out rate reduction (13.4.3)?</p> <p>The DDPC agrees that college, post-secondary education and/or full employment are critical outcomes for ALL students. (13.4.11) Sadly, such outcomes have not historically been true for students with disabilities. We fully support these anticipated outcomes and wonder what changes are anticipated for students with disabilities in order to achieve these results.</p>
11/18/96	Thomas C. Denne Mineral County Schools 39 South Mineral St. Keyser, WV 26726	See Attachment #1
11/18/96	P. Douglas Perks Jefferson County Schools PO Box 9897 Charles Town, WV 25414	See Attachment #2

Date	Individual/Organization	Comments
Section 4 - Annual Performance Measures (Continued)		
11/20/96	Tuscarora Elem. Faculty Sen. Members 200 Tavern Road Martinsburg, WV 25414	<p>4.1 How can all students be average or above? Does this address grade level percentile on total school percentile?</p> <p>4.5 Promotion rate should remain at 92%.</p> <p>4.7 To meet requirements all first grade classes should have an aide and less than 25 students.</p> <p>4.11 In order for 90% of 9th graders to graduate, social promotions need to be stopped.</p> <p>4.12 How will parents be involved? A great number of parents work and cannot come in to school.</p>

Date	Individual/Organization	Comments
Section 5 - High Quality Standards		
11/15/96	Janice Kirk Gibson 1st grade teacher 2406 Oak St. Parkersburg, WV 26101	Technology should continue to be a priority in our schools training and new equipment provided. If a student does not have the foundation established in primary grades, tech class will be an asset.
11/15/96	Sariee Sheets Rt. 2, Box 51-2 Walker, WV 26180	Technology is wonderful. However worn out, no money for repairs equipment won't do us any good.
11/15/96	Mike Burke Mineral County BOE 1 Baker Place Keyser, WV 26726	<p>5.1.18 Core programs taught daily . . . This would not allow implementation of block schedule in middle school - delete daily.</p> <p>5.1.25 Physical fitness test (50%). Delete physical fitness STD from policy.</p> <p>5.1.26 word based . . . 11-12. Change to 9-12.</p> <p>5.1.28 Instructional day. Maintain 315/330/345 standard.</p>
11/15/96	Myra Ault PO Box 220 Shepherdstown, WV 25443	If electives are not available, students have little opportunity to find out what their interests are.
11/5/96	Patricia S. Harrison, Parent, Jefferson County FACS Board Member 215 Tusawilla Hills Charles Town, WV 25414	<p>5.1.9 Real value is provided by clubs, activities and assemblies. Don't eliminate their chances.</p> <p>5.1.18 ADD: Developmental guidance/Life Skills. Especially good for self-esteem and team development.</p> <p>5.1.19 ADD: Supporting electives important to all career electives. Change to Supporting all career paths such as Child Development, Parenting, STEPS, Adult Roles and Functions, Consumer (Finance) Ed, Drivers Ed, Wellness, Life Skills, Communication Service Learning are offered. The above electives are important and essential in today's societal pressures. This education for individuals and young families will make an impact on workplace morale and productivity.</p>

Date	Individual/Organization	Comments
Section 5 - High Quality Standards (Continued)		
11/15/96	Conrad Lucas, WV PHA/HERO secretary Rt. 4, Box 495 Berkeley Springs, WV 25411	5.1.10 Real value is provided by clubs, activities, and assemblies. Don't eliminate chances for this.
	Marlyn S. Bisher 12 Heritage Dr. Shepherdstown, WV 25443	5.1.11 Strike and change to supporting electives such Child Development, Parenting, STEPS, Adult Roles and Functions, Consumer (Finance) Ed., Drivers Ed., Wellness, Life Skills, Communication Service Learning are offered. I would like to see these changes because families and individuals impact on workplace morale and productivity. Social pressures on families are increasing. I feel these electives are not only important, but essential, to assuring success at home and on the job.
	Patricia Wilmoth 204 Sybil Court Shepherdstown, WV 25443	5.1.18 ADD: Developmental guidance/Life Skills. Especially good for self-esteem and team development. Life skills and career readiness are offered through cooperative learning experiences that focus on in different skills. Time management, organizational skills, safety awareness, and working with others are skills necessary regardless of career choice. Leadership, planning, cooperation, time management, and many other skills are also taught in the youth organization FFA/HERO. 5.1.19 ADD: Supporting electives important to all career electives.
11/15/96	Patricia Wilmoth 204 Sybil Court Shepherdstown, WV 25443	5.1.10 (Instructional time protected) Clubs and school assemblies add enrichment to student learning. Do not lose this. 5.1.18 (Programs of study for 5-8) Add: a life skills class (ex. - BASE - a Family and Consumer Science class) that teaches skills needed to cope with real problems today. 5.1.25 (Electives, in grades 9-12) Re-instate STEPS, Adult Roles and Functions, and Parenting as electives or as one credit requirement for graduation. The management skills and problem solving skills taught will increase the success of the student in the work place and the home (which ultimately affects work!)

Date	Individual/Organization	Comments
Section 5 - High Quality Standards (Continued)		
11/18/96	Pamela Wilmer Jr. High Family of Consumer Science Teacher Rt. 1, Box 65-P Shenandoah Jct., WV 25442	5.1.18 ADD: developmental guidance/life skills essential for all students to get the self esteem help needed. 5.1.19 ADD: need to add electives. 5.1.25 Strike and add to supporting electives such as child development, Parenting, STEPS, Adult Roled Functions, Drivers Ed. These changes important because of need to stress family and its importance. Also important to on the job training.
11/18/96	Joe McClung, Principal Meadow Bridge High School PO Box 11D Meadow Bridge, WV 25976	5.1.5 Increase number of professionals allowed in funding formula to allow for supervision of work based learning. 5.1.22 Developed on local level or guidelines developed on state level? 5.1.23 5.6.1 Do we test too much?
11/18/96	Cheryl H. Ornick 109 Wilson Avenue Morgantown, WV 26505	5.1.18 Career readiness and skills for life are taught through cooperative. Learning experiences that focus not on the primary skill being taught (example: food preparation) but also includes time management skills, organizational skills, safety awareness, and working with others, which is necessary regardless of career choice. Leadership skills are taught and strengthened through the youth organization, Future Homemaker of America. ADD: developmental guidance/life skills. This is especially beneficial for self esteem and teen development. 5.1.19 ADD: supporting electives important to all career electives. 5.1.21 Strike and change to supporting electives such as child development, Parenting, STEPS, Adult Roles and Functions, Consumer Education, Parenting, Drivers Education. Service Learning are offered. I would like to see these changes because families and individuals have an impact on the workplace morale, and productivity. Societal pressures on families are not only important, but essential to assuring success at home and on the job.

Date	Individual/Organization	Comments
Section 5 - High Quality Standards (Continued)		
11/18/96	Judy Kepple 1008 Tinsley Shepherdstown, WV 25443	Electives need to be provided that allow for personnel development - Consumer and Homemaking classes provide opportunities for learning about nutrition, interpersonal skills, parenting, child development, consumer economics - skills much needed in our complex society. Needed more information to make informed comments!
11/18/96	Patricia Stealy Box 572 Shepherdstown, WV 25443	5.1.18 Add some requirements that include life skills, self-esteem, interaction in groups and families. 5.1.21 All of these topics can be included in a family and consumer science class as a non core elective.
11/18/96	Lavana Jane Higginbotham Elizabeth Beale William Aberegg Nettie Herrick Magnolia High School 601 Maple Avenue New Martinsville, WV 26155	5.18 Program guides available - Define proper guides. This is vague and seems useless. What the intent of this? 5.19 This is not good. It will reduce student opportunities. Co-curricular and extra-curricular programs outside school hours. 5.1.25 50% increase in passing President's Fitness test is excessive. 5.1.26 Full year of work based experience - Meaningful work is impossible to find for many students a rural state. Where will staff and funds com from to find work placement, monitor students, etc.? 5.2.5 Faculty senate funds - Do guidance counselors receive funds, too? 5.6.11 These two items are badly out of logical order. 5.6.12
11/18/96	Harold D. Garber, Superintendent Grant County Schools 204 Jefferson Avenue Petersburg, WV 26847	5.1.8 Small counties with limited staffs/funding would be hard-pressed to do any more than provide state "curriculum." 5.1.25 Unattainable goal - talk to devel. experts. 5.1.28 Lengthened day would have detrimental effect on K-primary students who have to follow same bus schedules as Seniors. 5.9.5 Where do you find these leadership courses?

Date	Individual/Organization	Comments
Section 5 - High Quality Standards (Continued)		
11/18/96	Donna Z. Heuneman Executive Director, WV Developmental Disabilities Planning Council 110 Stockton St. Charleston, WV 25312	<p>5.1.27 Addressed multicultural education. This should include disability awareness and zero tolerance for harassment or violence against people with disabilities.</p> <p>5.5.5 This citation should also include the Americans with Disabilities Act. We applaud this section relative to accessibility, and would encourage training on what that really means. It is not just a ramp for wheelchair access.</p> <p>5.6.23 Some types of warranty needs to be made available to those students with significant disabilities who attain a proficiency in a functional curriculum. Standards need to be developed with curriculum committee and special education. We understand that Kentucky has developed an alternative portfolio in this area.</p>
11/18/96	Pamela Jackson, Teacher Rt. 1, Box 97-1-A Lindsie, WV 24951	<p>5.1.15 Students not achieving mastery ... are provided reteaching and tutorial services. How will these services be provided? Our faculty has a full teaching load now and we do not have the staff/time to reteach/tutor on an individual basis.</p> <p>5.1.26 Work-based learning experiences ... for all students ... in grades 11-12. In a small rural community this will be a great challenge. Providing an opportunity, supervising the experience, and fairly assigning a grade/credit will be difficult. What will the penalty be for those who do not participate? What documentation will be necessary to ensure that all students are meeting this requirement?</p> <p>5.1.28 An instructional day is ... 360 minutes for grades 9-12. This extension of time will only add to the already long day for many of our students who travel many miles and must sit in bus halls. Will this also add minutes required to earn graduation credit, currently 8100 minutes? Our day is quite full now, we do not need additional minutes.</p> <p>5.6.19 Work Keys at grade 12 ... I administered this test this month. In my opinion, the video test on teamwork was not a good test. It stereotyped career individuals, was difficult to see and read, bored the students and encouraged group response to answers. Additionally, the Stanford Achievement Test does not correlate well with the curriculum, at least not in the area of social studies. Too much review for assessment is required in order to prepare for the test.</p> <p>5.6.21 ... an electronic portfolio. ... Is issued to each graduate. What will this include? Will it be like the current permanent record card or will it include student work?</p> <p>5.9.9 Orientation meetings for all teachers who will be using newly adopted instructional materials. This will be very beneficial, but will it be during the school day, inservice, or another after school meeting?</p> <p>5.10.10 Principal observes teacher and student performance in the classroom and provides feedback and recommendations for improvement each semester. Is this return to the required observation and evaluation for all teachers, rather than the current Phase I and Phase II evaluation process? The current process has been very workable and it allows teachers self-evaluation.</p>

Date	Individual/Organization	Comments
Section 6 - County Annual Improvement Process		
11/15/96	Janice Kirk Githon 1st grade teacher 2406 Oak St. Parkersburg, WV 26101	Planning is crucial to the success of our students. Please allow Primary teachers to plan for primary students and secondary students/teachers to plan for secondary students. Our expertise should be used properly.
11/15/96	Mike Burke Mineral County BOE 1 Baker Place Keyser, WV 26726	6.4 Insert <u>intentional</u> before falsification of information
11/18/96	Dave Cooper, Principal 207 Bryan Street Parkersburg, WV 26847	6.4 Falsification - Should read intentional falsification. This would cover in case an honest mistake is made.
11/18/96.	Harold D. Garber, Superintendent Grant County Schools 204 Jefferson Avenue Parkersburg, WV 26847	6.4 Word intentional should be added prior to falsification.
11/20/96	Tuscarora Elem. School Faculty Senate 200 Tavern Road Martinsburg, WV 25401	All changes seem appropriate.

Date	Individual/Organization	Comments
11/15/96	Patricia S. Harrison, Parent, Jefferson County FACS Board Member 215 Tusawilla Hills Charles Town, WV 25414	As a member of the Jefferson County Family and Consumer Sciences Board I have recently learned about several sections of Senate Bill 300 - Policy 2320 and 2510. Specifically, Policy 2510 has been written to such an extent FACS previously required electives (ARF, STFPs, and Parenting) are no longer mentioned in the previous policy. Which means no county has to offer these courses! Similarly in Policy 2320 (page 8) these courses have been stricken as available electives. In Policy 2510, co-curricular and extra-curricular activities are no longer to be held during the instructional day. This means no FFA-HERO meetings (local, state, and national) are to be held during the school day co-curricular and extra-curricular are defined as one and the same in the glossary on page 7 of Policy 2510. Having seen first hand, as a parent volunteer and FACS Board member the life changing impact of these classes and organizational opportunities please consider my enclosed comments and others concerning this matter. How many other parents will be shocked when they find out these classes are eliminated?
11/15/96	Patricia Wilmoth 204 Sybil Court Shepherdstown, WV 25443	Family and Consumer Science courses (previously) called Home Ec. Or Consumer and Homemaking) offer students the chance to succeed with real life situations. The skills for life (organization, management, child care, clothing care, family cooperation) are not offered in any other discipline. They are essential for success in this world.
11/18/96	Pamela Wilmer Jr. High Family of Consumer Science Teacher Rt. 1, Box 65-P Shenandoah Jct., WV 25442	Please give some more thought to a lot of these suggestions. Those of us on the firing line know that they wouldn't work.
11/19/96	Keyser High School 1 East Piedmont Street Keyser, WV 26726	See attachment #4

Other Comments

MINERAL COUNTY SCHOOLS PSYCHOLOGICAL SERVICES

Mineral Street Annex
39 South Mineral Street
Keyser, West Virginia 26726
Phone: (304) 788-4218

Susan C. Vance, Ed. S.
Kelly E. Maruschak, M. S.
Disa Ruiz, M. S.

Thomas C. Denne, Ph. D.
Coordinator

November 15, 1996

Ms. Donna K. Edwards, Director

Office of Accreditation and Recognition

West Virginia Department of Education

Building 6, Room 330

1900 Kanawha Blvd., East

Charleston, WV 25305-0330

Dear Ms. Edwards:

For several months during late 1995 and 1996, I had the privilege to serve on the W. Va. Test Advisory Council and the Test Selection Steering Committee.

My compliments are extended to the State Department of Education leaders who worked tirelessly in coordinating the Committee efforts.

In December of 1995, at the Pope John XIII Conference Center, I was extremely hopeful that the Committee would design an assessment instrument that would incorporate: the unrealized, practical, criterion referenced utility of WASTER; the norm referenced comparative statistical usefulness of CTBS/4; and the performance based, wholistic, criterion oriented productivity of the Writing Assessment Program.

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I believe in high expectations! I believe that all children can learn! I believe in the value of a West Virginia public education!

Attachment #1

I do not believe in the deceptive, overemphasized on a norm referenced standardized achievement measure as the student performance accountability tool. Policy 2340, 126-13-5.6.23 in establishing the fifth percentile as the statewide lower level warranty minimum does a disservice, statistically, to students. Statistically the term "average" includes that portion of the normally distributed population that is within one standard deviation of the mean. A fifth percentile standard excludes approximately half of the average range (that portion between one standard deviation below the mean up to the mean itself). This large chunk of students, while still average, would all heretofore be excluded from warranty. By eliminating such a large portion of the average range, we are excluding from warranty consideration a large number of average, normal, competent students.

Some may make the argument that our academic interventions justify using the fifth percentile as the minimum warranty level. This argument suggests that our educational/instructional interventions are sufficient to allow us to abandon statistical normalcy in our reasonings. If our educational interventions are sufficient to make our student population skewed (not normal), then, I suggest, we should not be adhering to the same statistical criteria used by the norm group on which the SAT/9 was standardized. To do so only serves as positive public relations without statistical credibility.

Further, I contend that Policy 2320, 126-13-4.1 is even more statistically inappropriate than the prior Warranty example, just cited. We will all be "High Average" and those of our children who are struggling, will "struggle less" each year. What was the percentage of special education students included in the SAT9 standardization group? What were the severity levels of student handicaps? How do the answers to the prior questions compare with state/country special educational data?

Are we suggesting that special education students won't be handicapped anymore now that everyone else is "High Average"? Or are we suggesting that our educational interventions will be sufficient to make special education students appear to be no longer handicapped on the SAT9? If the latter is what we are suggesting, it is inappropriate to compare our students to the norm group on which the Stanford 9 was standardized. The norm group did not have the benefit of our interventions prior to taking the test for standardization purposes.

There are many unresolved issues/questions regarding the appropriate inclusion of special education students in the SAT9 process. Dr. Michael Valentine's 9-10-96 on the inclusion of special education students in the accountability system may be a reasonable first step in clarifying some of these issues. However, I fear that we are not close to being able to equitably implement this memo, given the complexity of the issues and the significance of their impact on system wide accountability.

In December, we had high hopes of designing a West Virginia Assessment Device that all of us would be proud of--a device that would allow student performance to be assessed against various standards that we as proud West Virginia educators, determined to be appropriate. Instead, we settled for a very good norm referenced standardized assessment tool--a useful tool but not the all inclusive ideal instrument that we had hoped for. Let's not overdo accountability by pretending that we have an assessment tool that even approaches what we had hoped to have on

Ms. Edwards

Page 3

November 15, 1996

that cold morning in December, 1995!

In the name of accountability, we cannot submit the children of West Virginia, its educators, and its various publics to a system that screams of statistical inappropriateness.

Sincerely,



Thomas C. Denne, Ph. D.

Coordinator of Psychological Services

/th

P.S. My compliments to all of those State Department educators who worked tirelessly to produce the four part components described in the Background Section of the Executive Summary - Regulations for Statewide Assessment Program - Policy 2340.

While naming names is dangerous as I am sure that I will miss someone, Keith Smith, Terry Wilson, Karen Nicholson, and Jan Barth demonstrated dedication, flexibility, determination, optimism in the face of adversity, and, especially congeniality in working through this challenging Test Selection Process. Also, Larry Jones was an excellent, knowledgeable Committee Chairperson.

The Components are reasonable, given the constraints that we worked under. The results of our efforts are also reasonable.

I, obviously, have great reservations about implementation/accountability components.

cc: Jan Barth
Karen Nicholson
Sam Kalbaugh
Pat Mason

Put this on hold until an adequate collection process and data collection has occurred to establish a standard.

4.11

Is the promotion rate inconsistent with the time is variable philosophy? If so it should be adjusted to reflect that goal.

4.5

To be consistent with the standard in 4.3, the graduation rate should remain at 83%.

4.4

Formula should be calculated on first month enrollment grades 7 - 12. The dropout rate should be a county standard for accreditation, not a school improvement process. However, all feeder schools share in the responsibility for dropouts. should be an important part of the standard. School dropout rates

4.3

Do minimum requirements address individual grade level or school performance?

4.1

Comment(s)

Proposed Policy

Address: Jefferson County Schools
P. O. Box 987
Charles Town, WV 25414

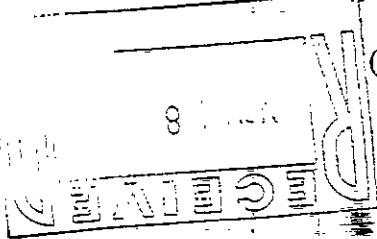
Name of Individual/Organization: P. Douglas Perks

Directions: Please use this form in Commenting on the proposed policy and regulations on Performance Based Accreditation System (2320).

Performance Based Accreditation System (2320)

COMMENT LOG

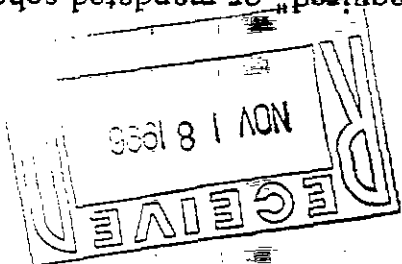
CURR.165.96.02



4.14	Inconsistent with the standard set in 4.1. Should remain at 50%.
4.15	In reference to comments re 4.14 this section should be eliminated.
4.16	How is this measured? What does it mean?
5.1.8	This is inconsistent with the format of Policy 2520. If this is desired a suggested format with all categories requested should be prepared by the WVDE.
5.1.19	To ensure effective implementation
5.1.22	delay implementation date until ninth
5.1.23	grade class 1999-2000.
5.1.25	There must be a more appropriate way of measuring this criteria. What is the basis for a 50% standard?
5.1.26	Delay implementation until 1999-2000. Also expand to include grades 9 - 12.
5.1.28	Consider the impact on students who are transported by school bus for long periods of time.
5.6.23	Again to be consistent delete the 70% warranty.

1. Senate Bill 1 - The legislative/legal basis of "required" or mandated school board member training - became effective August 30, 1990. The previous date May 8, 1990, refers to a prior state Board of Education policy directive.
2. Although "training" is not defined in Code, it is a defined term of the West Virginia School Boards Association/West Virginia Department of Education Training Standards Review Committee. That Committee, as of Fall, 1990, operates on behalf of the state Board to determine standards for school board member training. Nowhere is the term "professional development" utilized - neither in law or in the TSRC definition of training. (Refer to 7.1).
- Moreover, the term (professional development) is not applicable to school board members. They are not professionals in the sense of educators, and their training - by law - is for the purpose of better boardsmanship and governance effectiveness.
3. The term *effective*, while only one word, adds depth, structure and meaning. Proposed 7.2 could read "effective board service, personnel relations and development, policy development, school finance, curriculum and instruction, school law, communications, community relations and leadership."
4. The addition of "communication" and especially "leadership" as foci for training is to be commended.

PROPOSED 7.2



Should not 7.1 allude to the statutory citations for training: boardmanship and governance effectiveness?
Again, refer to earlier comments about professional development.

PROPOSED 7.1

REACTIONS TO POLICY 2320

1. Where does special education fit in?
If a person has an identified handicap and is asked to meet same standards in his identified area as a non-handicapped person, that is discrimination. Could handicapped area scores be pro-rated out?

2. Will 8 - 4 time frame will not meet the requirements?
How will facility stay open?
How will extra-curricular areas be affected?

3. Have businesses been contacted to know whether they will cooperate?

4. If standards keep raising, how can everyone be at 100%?

5. Preventive discipline measures - alternative schools - will be needed and 100% support will be needed from the boards of education.

6. How will parent involvement be measured?

7. How will parent satisfaction be measured?

8. Attendance director can not always insure good attendance - better monitoring of this program is needed.

9. Standards raise - students having difficulty are frustrated by lack of success and drop out.

10. Materials/curriculum must be provided to implement these programs. Burdens should not be placed on the secondary teacher. Curriculum directors should do their jobs.

11. Who will be responsible for the electronic portfolio?

12. Where will funding come from for additional computer resources?

13. Who will guide students in grades 5 - 8 to choose career clusters?

14. Work-related areas in the community - will there be enough opportunities?

15. 25.1.295 - Are those electives eliminated? They are needed especially for special education.

Course requirement changes:

1. What is the minimum number of credits for graduation?

2. AP program will be lost because of test requirement.

3. What will happen to the gifted program?

4. Will there be additional funding for staff to deliver mandated curriculum?

5. How are changes in number of cluster areas to be accommodated?

KEN HECHLER
Secretary of State

MARY P. RATLIFF
Deputy Secretary of State

JAN CASTO
Deputy Secretary of State

CATHERINE FREROTTE
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Director, Administrative Law

PENNEY BARKER
Supervisor, Corporations

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OFFICE OF THE SECRETARY OF STATE
RECEIVED
FEB 19 1997

(Plus all the volunteer help we can get)

TO: Donna Edwards
VIRGINIA HARRIS

AGENCY: EDUCATION

FROM: JUDY COOPER, DIRECTOR, ADMINISTRATIVE LAW DIVISION

DATE: February 13, 1997

THE ATTACHED RULE FILED BY YOUR AGENCY HAS BEEN ENTERED INTO OUR COMPUTER SYSTEM. PLEASE REVIEW, PROOF AND RETURN IT WITH ANY CORRECTIONS. IF THERE ARE NO CORRECTIONS, PLEASE SIGN THIS MEMO AND RETURN IT TO THIS OFFICE. YOU WILL BE SENT A FINAL VERSION OF THE RULE FOR YOUR RECORDS.

PLEASE RETURN EITHER THE CORRECTED RULE OR THIS FORM WITHIN TEN (10) WORKING DAYS OF THE DATE YOU RECEIVED THIS REQUEST. CALL IF YOU HAVE ANY QUESTIONS.

SERIES: 13 TITLE: 126 EDUCATION

* THE ATTACHED RULE HAS BEEN REVIEWED AND IS CORRECT.

SIGNED: Donna K. Edwards
TITLE OF PERSON SIGNING: Director, Office of Accreditation
DATE: 2/21/97

* THE ATTACHED RULE HAS BEEN REVIEWED AND NEEDS CORRECTING. THE CORRECTIONS HAVE BEEN MARKED.

SIGNED: _____
TITLE OF PERSON SIGNING: _____
DATE: _____

NOTE: IF YOU ARE NOT THE PERSON WHO HANDLES THIS RULE, PLEASE FORWARD TO THE CORRECT PERSON.