

**126CSR32, Policy 2444.4, Issuance of the State of West Virginia High School Diploma and the Administration of the West Virginia High School Equivalency Test, Option Pathway, and Mountaineer Challenge Academy Graduation Pathway
Comment Log**

Comment Period: April 10, 2024 – May 13, 2024

Action

A/S Comment was accepted and supports the proposed policy.

A/C Comment was accepted and resulted in changes to the proposed policy.

N Comment was not accepted.

Date	Commenter	Comments	Action	Rationale
§126-32-1. General				
2024-05-13 00:44:46	Kim Sallada KCS HiSET Test Administrator / KCS CTE/CWST Coordi Kanawha County Schools Charleston WV	No Comment	N	
§126-32-2. State of West Virginia High School Equivalency Diploma				
2024-05-13 00:44:46	Kim Sallada KCS HiSET Test Administrator / KCS CTE/CWST Coordi Kanawha County Schools Charleston WV	No Comment	N	
§126-32-3. Applying for Testing				
2024-05-13 00:44:46	Kim Sallada KCS HiSET Test Administrator / KCS CTE/CWST Coordi Kanawha County Schools Charleston WV	3.1 Applicants are required to pass an approved HSEA practice test with the minimum scores as determined by the WVDE. An Adult Education instructor, an Option Pathway teacher, (old policy included an HSEA examiner which has been removed)	N	This section defines who submits the eligibility documentation and not who can administer the practice test.

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		Comment: It gives counties an additional option for those schools without an Option Pathway program to have the county HSEA examiner give the OPT to Option 2 and 3 students at their home high school instead of them going to the career center.		
§126-32-4. Criteria for Administering the State of West Virginia HSE Test				
2024-05-02 15:57:03	Laura Crouch Teacher Kanawha County Schools Belle West	Section 4.3 is crucial for teachers in the programs to be successful. We need the schedules in advance so we can plan teaching, paperwork, practice tests, and meetings. Currently, there is no policy for a schedule. We are receiving test dates only a few weeks in advance which makes it extremely difficult. Test dates are also changed with little notice and this disrupts our planning and teaching.	A/S	
2024-05-13 00:44:46	Kim Sallada KCS HiSET Test Administrator / KCS CTE/CWST Coordi Kanawha County Schools Charleston WV	New Policy 4.3: HSE test administrators at non-residential test centers must submit a test center schedule to the Option Pathway teachers and Adult Education instructors in their county jurisdiction no later than September 1 each school year, which includes all test dates and times through the end of June of that school year. This test center schedule must correspond with the online test center schedule that is within the test publisher's scheduling portal, which makes it available to the public. Teachers must be informed of any changes to the schedule at least 30 days in advance and the test center online schedule within the test publisher's scheduling portal updated to reflect these changes. Comment: As a test administrator in Kanawha County I understand the need for a schedule from September 1 to June 30 but to require a 30 day	N	To provide every opportunity for students who have jobs or other responsibilities (e.g., arranging childcare and transportation, notice at work, etc.), to schedule test administration, it is imperative that we provide them with a schedule well in advance with changes only occurring in the case of an emergency. Further details regarding schedule changes are outlined in West Virginia HSE Test Administrator's Manual.

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		<p>notice to KCS teachers makes it more challenging. Kanawha County has the Option Pathway program in 7 schools and uses the computer labs at Ben Franklin and Carver Career Centers which are also used by other CTE programs, in addition to changes in their career center schedules. To implement a WVDE policy with a 30-day notice to teachers is not a best practice to meet the needs of all KCS students in the Option Pathway program testing at Carver and Ben Franklin since they may also have a scheduled event conflict at their high school. Also, the test centers may have a request to change the days due to conflict they may have that was not foreseen in September.</p> <p>For high school programs it should be a tentative schedule that is subject to change as a local county decision.</p> <p>New Policy 4.3.a: Test center schedule changes that are necessary due to an emergency closure for inclement weather, test administrator illness or other unforeseen circumstances shall be communicated to teachers and to students as soon as possible.</p> <p>Comment: Policy 4.3 is requiring a 30 day notice to teachers but 4.3.a includes an unforeseen circumstance which gives a county the flexibility to make a decision based on the comment I made in 4.3.</p> <p>Would an unforeseen circumstance include that a</p>		
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		<p>schedule would need to be changed based on the request of Ben Franklin and Carver Career Centers having a scheduling conflict and similar situations?</p> <p>New Policy 4.3.b: Test sessions that need to be added to an existing test center schedule are permitted any time it is deemed necessary without the required 30 day notice. These additions shall be communicated to teachers and changed in the outline scheduling portal as soon as possible.</p> <p>Comment: This is great to have in place so I would like the 30-day notice to teachers as stated in 4.3 changed to a tentative schedule is set from September 1-June 30 that KCS or reserves the right to change in the best interest of scheduled conflicts, including those of the testing administrators.</p> <p>In closing, each policy states a different scenario but a county should have the ability to change a testing date that is more within a window of two weeks prior instead of 30 days.</p> <p>New Policy 4.4: Test administrators who are found to be in violation of HSE test policies and/or procedures shall be placed on a plan of improvement or suspended from testing, depending on the infraction, in accordance with the procedures outlined in the West Virginia HSE Test Administrator’s Manual.</p> <p>Comment: The word shall closes a door but</p>	<p align="center">N</p>	<p>High school equivalency testing is a high-stakes test that generates a nationally recognized credential. To maintain the integrity and security of the HSE testing program stringent policies and procedures are required and must be maintained. Testing infractions can result in loss of testing privileges, significant fines, and/or prosecution for the State of West Virginia,</p>
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		<p>events with their other jobs that they overlooked, they failed to communicate with the test centers about potential test dates and did not know there was a scheduling conflict, etc.). All of this to say, I don't want to be getting an email every 30 days that says, "Next month's test dates have changed." I feel the current phrasing leaves room to justify insufficient planning in the testing schedule. I would like to see some clarification in the policy of instances where it is appropriate to make changes to the schedule 30 days in advance (outside of obvious, unavoidable circumstances like natural disasters, sudden illness of a test administrator, etc.).</p>		
§126-32-5. Basis for Issuing the State of West Virginia High School Equivalency Diploma				
2024-05-13 00:44:46	<p>Kim Sallada KCS HiSET Test Administrator / KCS CTE/CWST Coordi Kanawha County Schools Charleston WV</p>	No Comment	N	
§126-32-6. Testing of Individuals 16, 17, or 18 Years of Age				
2024-05-13 00:44:46	<p>Kim Sallada KCS HiSET Test Administrator / KCS CTE/CWST Coordi Kanawha County Schools Charleston WV</p>	<p>6.2: All individuals meeting one of the requirements above must also provide HSE testing eligibility documentation signed by an AE instructor, an Option Pathway teacher, A WVSDT or MCA staff member, or an HSE test administrator in accordance with the procedures in the WV HSE Test Administrator's manual.</p> <p>Comment: In Applying for Testing 3.1 it removes</p>	N	<p>§3.1 defines the eligibility documentation and who submits it. §6.2 outlines who signs the eligibility documentation.</p>

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		HSEA examiner from giving the practice test but then in 6.2 it lists the HSE test administrator.		
§126-32-7. Testing of Individuals 16, 17, or 18 Years of Age Participating in WVSDT or Government Program				
2024-05-13 00:44:46	Kim Sallada KCS HiSET Test Administrator / KCS CTE/CWST Coordi Kanawha County Schools Charleston WV	No Comment	N	
§126-32-8. Criteria for Administering Option Pathway in West Virginia Public High School and WVSDT Facilities				
2024-05-13 00:44:46	Kim Sallada KCS HiSET Test Administrator / KCS CTE/CWST Coordi Kanawha County Schools Charleston WV	<p>New Policy 8.2: Option 1 students who do not complete the Option Pathway program while a resident at WVSDT facility may return to their home high school to complete their graduation requirements as an Option Pathway student, provided the home high school has an approved Option Pathway program.</p> <p>Comment: George Washington, Herbert Hoover, and Sissonville High Schools in Kanawha County do not have an Option Pathway program so previously any returning student has gone to his/her feeder career center to test. Just need clarification because the way the policy reads those three high schools would need an Option Pathway program or would the feeder career center be an approved Option Pathway program for them?</p>	N	Students are dual-enrolled between their home high school and the career center/high school in order to receive Option Pathway services.
2024-05-13 11:50:17	Anonymous Kanawha County Schools Charleston WV	I had one student this year who was not doing great in his CTE program because of attendance. While he admitted the material was not extremely interesting to him, he also said it was easy and that he was keeping up with all the work. Unfortunately,	A/S	

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		<p>though, the program was strict in its attendance policy. We thought about a job, but the student does not have transportation anywhere and lives too far out for public transportation. My principal suggested the CIEL program, but admitted that she didn't know a lot of details of the content. When she contacted the school to ask about it, they also had very little information. Fast forward several months: The student got the highest combined HiSET score of any of my students (83), got a perfect score of 20 on one of the exams, and was thriving in the CIEL program (after finally getting started in it, after lots of emails between people). He is clearly an extremely bright individual, but just did not fit into traditional education. When I caught up with him a few weeks ago and asked about how his CIEL program was going, he was telling me how useful and convenient it was. He said since everything is online, he is able to keep up with it. On top of that, he was actually excited about the well-rounded nature of the program, and how beneficial it will be to whatever job he pursues in the future. He said, "I am getting so many certifications that will make me more marketable, as well as provide flexibility for the job market." He was extremely successful in that program, and I do not think he would have graduated with a high school diploma without it.</p> <p>I say all this to highlight 2 things: 1. It is clear that the CIEL program is very valuable to a certain set of students who might struggle in other CTE programs (in my student's case, he was</p>		
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		<p>simply bored and unchallenged, and therefore had little incentive to be there), and especially to students who might not know what type of career path they're looking to pursue. The CIEL program allows them to expand the breadth of their introduction to and experience with different types of employable skills.</p> <p>2. It was also evident, at least in this one instance, that the people who should know about the program do not know enough. I'm so grateful that my principal at least had the name of it in the back of her mind in order to have it to go on. But even after that, I know it was a few weeks before there were any definitive answers about the program. I even had my student's gifted supervisor ask me a question about the curriculum (I did not know the answer, but I happened to know the person who helped create the program, so I asked her). My point is: all persons involved in the Option Pathway program - from teachers to counseling to administrators - need the CIEL program (what it is, what skills and certification it provides to the students, and example circumstances where it might be a better fit for their CTE requirement) to be part of their training. It is not well known enough, I believe it is an integral addition to the policy as a valuable CTE option for students.</p>		
§126-32-9. Criteria for Administering Option Pathway Supplemental Program				
2024-05-13 00:44:46	Kim Sallada KCS HiSET Test Administrator / KCS CTE/CWST Coordi	Old: Schools that have an operational Option Pathway program may offer seniors the HSEA as credit recovery in one content area. This supplemental program is referred to as HSEA credit	N	§3.1 defines the eligibility documentation and who submits it.

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	<p>Kanawha County Schools Charleston WV</p>	<p>recovery.</p> <p>New Policy 9.1 Schools that have an operational Option 1 program may offer seniors, as defined in the Optional Pathway Organizational Manual, the HSEA test as credit recovery in one core content area. This is credit recovery of courses the student has attempted and failed; this shall not be used as credit replacement of courses not taken. This supplemental program is referred to as HSE credit Recovery (Option 2). Schools that are utilizing the Option 2 supplemental program must follow all policies and procedures for Option 2 as outlined in the Option Pathway Organizational Manual, which is available upon request by contacting the WVDE Optional Pathway Coordinator</p> <p>Comment: George Washington, Herbert Hoover, and Sissonville High Schools in Kanawha County do not have an Option Pathway program and have relied on KCS HSET test administrators to give the OPT to their students and this is why we would like for HSEA examiner to not be removed from 3.1. There have also been situations where Option 2 and 3 students have been sent to Carver and Ben Franklin for the Option Pathway teacher to give the OPT.</p> <p>Just need clarification because the way the policy reads those three high schools would need an Option Pathway program or would the feeder career center be an approved Option Pathway program for them?</p>	<p>Students are dual-enrolled between their home high school and the career center/high school in order to receive Option Pathway services.</p>
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§126-32-10. Criteria for Administering the MCA Graduation Pathway				
2024-05-02 15:57:03	Laura Crouch Teacher Kanawha County Schools Belle West	In looking at the policy, I believe it would make the most sense if WVSDT and the MCA language were the same. Also, for both the MCA and WVSDT it would make better sense if students are returning to school they are enrolled in Option Pathway ONLY when they have an option pathway program in place already.	N	MCA programs function differently than WVSDT because the MCA is operated by the National Guard.
2024-05-13 00:44:46	Kim Sallada KCS HiSET Test Administrator / KCS CTE/CWST Coordi Kanawha County Schools Charleston WV	<p>New Policy 10.3.b: A MCA student who graduates from the MCA program but who does not meet high school graduation requirements, may return to the public high school to complete the deficient areas of student required for a regular high school diploma as an Option Pathway student in accordance with this policy or as a traditional high school student as provided in Policy 2510</p> <p>Comment: MCA students returning to their home high school have exhausted their three attempts and based upon the date they took the first test at MCA are under the 6 month testing rule and may not be eligible to test prior to graduation. For example: a student takes the first test on January 21 and returns to his/her high school and would not be eligible to test until July 22 and have no hope of graduating.</p> <p>It would be in the best interest of the student to return with the opportunity to take their remaining one test at their home high school or have a 4th time testing waiver.</p> <p>New Policy: 10.3.c.1: An Option Pathway student</p>	N	The test publisher sets the requirements for retesting.

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		<p>who does not meet high school graduation requirements while a resident at MJCP may return to their home high school to complete the deficient areas of study required for a regular high school diploma as an Option Pathway student per this policy, provided the high school has an Option Pathway program, or as a traditional high school student as provided in Policy 2510.</p> <p>Comment: George Washington, Herbert Hoover, and Sissonville High Schools in Kanawha County do not have an Option Pathway program but previously the students have gone to their feeder career center - the way the policy reads those three high schools would need an Option Pathway program.</p> <p>Just need clarification because the way the policy reads those three high schools would need an Option Pathway program or would the feeder career center be an approved Option Pathway program for them?</p>	N	Students are dual-enrolled between their home high school and the career center/high school in order to receive Option Pathway services.
§126-32-11. Residence				
2024-05-13 00:44:46	Kim Sallada KCS HiSET Test Administrator / KCS CTE/CWST Coordi Kanawha County Schools Charleston WV	No Comment	N	
§126-32-12. Transcripts of Scores				

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2024-05-13 00:44:46	Kim Sallada KCS HiSET Test Administrator / KCS CTE/CWST Coordi Kanawha County Schools Charleston WV	No Comment	N	
§126-32-13. Falsification of the High School Equivalency Assessment Information and/or Center Violations				
2024-05-13 00:44:46	Kim Sallada KCS HiSET Test Administrator / KCS CTE/CWST Coordi Kanawha County Schools Charleston WV	<p>13.2: Testing center violations shall be processed according to the procedures outlined in the West Virginia’s HSE Test Administrator’s Manual and may include suspension or loss of testing privileges and potential criminal prosecution</p> <p>Criminal prosecution is an extreme word to have in a WVDE policy when in 4.4 it states test administrators who are found to be in violation of HSE test policies and/or procedures shall be placed on a plan of improvement or suspended from testing, depending on the infraction, in accordance with the procedures outlined in the WV HSE Test Administrator Manual.</p> <p>The two policies should read the same.</p>	N	A revised West Virginia HSE Test Administrator’s Manual will be available on July 1, 2024.
§126-32-14. Testing Fees				
2024-05-13 00:44:46	Kim Sallada KCS HiSET Test Administrator / KCS CTE/CWST Coordi Kanawha County Schools Charleston WV	No Comment	N	
§126-32-15. Severability				

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2024-05-13 00:44:46	Kim Sallada KCS HiSET Test Administrator / KCS CTE/CWST Coordi Kanawha County Schools Charleston WV	No Comment	N	
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