

WEST VIRGINIA
SECRETARY OF STATE

JOE MANCHIN, III

ADMINISTRATIVE LAW DIVISION

Form #5

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2002 JUN -7 P 3:43

OFFICE WEST VIRGINIA
SECRETARY OF STATE

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

AGENCY: West Virginia Board of Education TITLE NUMBER: 126

CITE AUTHORITY: W.Va. Constitution, Article XII, §2, W.Va. Code §§18-1-1 and 4; 18-2-5 and 6; 18-2E-4, 5, 7, and 8; 18-5A-4; 18A-1-1; 18A-3-26; and 18A-3a-a

RULE TYPE: PROCEDURAL _____ INTERPRETIVE _____

EXEMPT LEGISLATIVE RULE X

CITE STATUTE(S) GRANTING EXEMPTION FROM LEGISLATIVE REVIEW

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

AMENDMENT TO AN EXISTING RULE: YES X NO _____

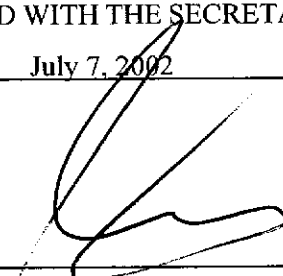
IF YES, SERIES NUMBER OF RULE BEING AMENDED: 42

TITLE OF RULE BEING AMENDED: Assuring the Quality of Education: Regulations
for Education Programs (2510)

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

TITLE OF RULE BEING PROPOSED: _____

THE ABOVE RULE IS HEREBY ADOPTED AND FILED WITH THE SECRETARY OF STATE. THE
EFFECTIVE DATE OF THIS RULE IS July 7, 2002


William J. Luff, Jr.

Deputy State Superintendent of Schools

SCANNED

\$16.50 w/out comments
\$27.30 w/comments

**EXECUTIVE SUMMARY
WEST VIRGINIA BOARD OF EDUCATION**

**POLICY 2510
Assuring the Quality of Education: Regulations for Education Programs**

COMMENT PERIOD ENDED MAY 25, 2002

BACKGROUND

Policy 2510 was placed on public comment in December 2001. Hundreds of comments were received and considered. A number of major changes were made to the policy based on the comments received. In addition, S.B. 247 passed by the Legislature during the 2002 session contains some provisions requiring changes to Policy 2510. The State Board placed the policy back on public comment until May 25, 2002.

MAJOR CHANGES TO POLICY 2510 AS A RESULT OF THE MOST RECENT COMMENT PERIOD

1. The percentage of students that must be in attendance in order for a day to be considered an "instructional day" has been specified at 75%. The policy now specifies that the 75% is the percentage of students in attendance countywide rather than at each school. In addition, provisions have been added that students will not be counted absent if it is not possible for students to attend school or if they are traveling to or participating in an authorized co-curricular or extra-curricular activity. (Sec. 7.2.12)
2. In the most recent version of the policy, as well as in this final version, the increase in graduation requirements in mathematics, science and foreign language requirements for professional pathway students, and the increase in mathematics requirements for skilled pathway students, have been retained, and a process has been added allowing students, with

their parents' approval and certain other safeguards, to select other career major courses that may increase the student's likelihood of success in college or are more relevant to the student's post-secondary goals. However, because of the proposed action by the Higher Education Policy Commission in adopting these increased graduation requirements as the criteria for admission to higher education baccalaureate programs, a requirement has been added to the process for substitution that both the student and his/her parents, when choosing to substitute other courses, must sign a form stating that they understand that in so choosing the student will not meet admission requirements for a baccalaureate degree program at any West Virginia public college or university. (Chart IV(B) and Sec. 8.2.6)

3. Regular season athletic events have been added to WVSSAC sponsored and sanctioned activities that do not count against the requirement that bank time may be used to allow extra-curricular activities for no more than one percent of instructional time. (Sec. 7.2.14.c.)
4. The effective date for the new graduation requirements in Chart IV(B) has been moved from the 2005-2006 school year to the 2004-2005 school year.
5. The effective date of the new electives required in Chart V has been moved from the 2005-2006 school year to the 2004-2005 school year.
6. Several references have been added to reflect the WV Virtual School (See, e.g., Secs. 6.4.16.c. and 7.2.13)
7. A sentence has been added to clarify that GPA (grade point average) is computed on the basis of all high school courses completed regardless of the grade during which the course was completed. (Sec. 8.2.4.d)

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TITLE 126
LEGISLATIVE RULE
BOARD OF EDUCATION

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SERIES 42

OFFICE OF WEST VIRGINIA
SECRETARY OF STATE

Assuring the Quality of Education: Regulations for Education Programs (2510)

§126-42-1. General.

1.1. Scope - This legislative rule establishes the regulations for all education programs that are to improve the quality of teaching and learning in the public schools and ensure that equal education opportunities exist for all students, including, but not limited to: comparably high quality programs of study, effective instructional strategies, work-based experiences, support programs, personnel, instructional materials, supplies, equipment, technology integration, and facilities.

1.2. Authority - W. Va. Constitution, Article XII, §2; W. Va. Code §§18-1-1 and 4; 18-2-5 and 6; 18-2E-4, 5, 7, and 8; 18-5A-4; 18A-1-1; 18A-3-26; and 18A-3a-a.

1.3. Filing Date - June 7, 2002.

1.4. Effective Date - July 7, 2002.

1.4.1. Unless specified otherwise within the policy.

1.5. Repeal of Former Rule – This legislative rule repeals and replaces W. Va. §126CSR42 "Assuring the Quality of Education: Regulations for Education Programs (2510)" filed July 7, 2000 and effective August 7, 2000.

§126-42-2. Purpose.

2.1. The West Virginia Board of Education is committed to establishing high academic standards and providing high quality programs for every student in West Virginia's public schools. The Board will collaborate with parents, educators, communities, business and industry, and higher education to fulfill this commitment. It is important that local boards of education, the school, community, students and families of students cooperate to establish high expectations for student performance and become actively involved in the education process, thereby enabling students to succeed in the classroom and the workplace, lead rewarding and productive lives, and participate responsibly in society.

2.2. Each county education program shall provide the necessary resources, including technology, to ensure that students attain high standards of performance. At

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early levels, students will achieve basic skills in reading, writing, mathematics, and computer applications. Achievement in these skills will provide the foundation for later intellectual challenges in all programs of study. Students will explore their interests and abilities and engage in relevant activities to help them understand the world of work. Technology will be a tool to help achieve these standards in all schools. The West Virginia Board of Education anticipates the provision of sufficient resources and support, including an adequate system of professional development, appropriate instructional materials, and reliable assessment measures, to realize the West Virginia Education Goals listed in Section 3.1.

2.3. Schools, in cooperation with county boards of education, will determine their individual approaches, pursuant to this policy, to assist students in mastering the adopted content standards and objectives. Appropriate accountability measures will ensure that students and educators achieve high levels of performance.

§126-42-3. Scope.

3.1. The major purposes of these regulations are to improve the quality of learning and teaching in the public schools and to ensure that equal education opportunities are provided to all public school students. Equal education opportunities to achieve one's potential include, but are not limited to comparably high quality programs of study, including work-based experiences; student support programs; personnel; facilities; instructional materials; supplies; equipment; technology integration; and effective instructional practices. Given the demands of the world and workplace today, it is essential that all students be prepared for success in post-secondary education and work.

3.1.1. Education Goals. (W. Va. Code §18-1-4)

a. Through the combined efforts of the government, the school system and the people, the following West Virginia Education Goals will be achieved:

- A. all children entering first grade will be ready for the first grade;
- B. all students will have equal education opportunity;
- C. 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 50 percent;
- D. ninety percent of ninth graders will graduate from high school;
- E. high school graduates will be fully prepared for college, other post-secondary education, or gainful employment. The number of high school graduates

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entering post-secondary education will increase by 50 percent; and

F. all working age adults will be functionally literate.

3.1.2. Refined Goals.

a. The West Virginia Board of Education in December 2000 adopted the following refined goals:

A. Ready children to learn;

B. Teaching all children to read;

C. Ensuring individual mastery of the basic skills in reading, writing and mathematics;

D. Building middle level education;

E. Strengthening adolescent education (9-12);

F. Developing responsibility, citizenship and strong character in students;
and

G. Preparing for and providing lifelong learning.

3.1.3. Strategies for Achieving Goals

a. The following strategies will be employed to achieve the West Virginia Education Goals and Refined Goals:

A. Creating/strengthening partnerships with parents, the community and other agencies;

B. Using research-based practices;

C. Communicating more information to parents and the community, and keeping that information concise, accurate and understandable;

D. Using technology wherever feasible;

E. Aligning curriculum and instruction K-16;

F. Improving schools;

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- G. Changing/increasing expectations;
- H. Refining the system of assessment and accountability;
- I. Overhauling the system of professional development;
- J. Ensuring that educators have the skills to teach and foster the development of children;
- K. Providing more instructional time for students who need it;
- L. Changing teacher practices and assessment to encourage critical and creative thinking; and
- M. Providing a safe and nurturing environment for all students.

3.2. Thorough and Efficient System - Ensuring a quality education implies that a thorough and efficient education system exists that provides equal access to substantive curricular offerings and appropriate related services for all students. Providing such an education system must be the goal of the West Virginia Board of Education, West Virginia Legislature, West Virginia Department of Education, county boards of education, and the people of West Virginia. This policy provides the basic structure for all education programs and student support services necessary for a thorough and efficient system of education to be available to all students. The elements of a thorough and efficient system of education are:

3.2.1. high quality education programs, student support services, and work-based experiences;

3.2.2. high quality administrative and instructional practices, personnel, facilities, instructional materials, technology integration, supplies, and equipment;

3.2.3. a safe and caring environment that fosters supportive relationships, is free from harassment, intimidation, bullying, discrimination and other inappropriate forms of conduct, and involves parents;

3.2.4. a demanding curriculum for all students, with emphasis on the core academic programs of study, coupled with high expectations communicated to students, parents, and communities, and

3.2.5. accountability measures to ensure the public that a thorough and efficient system of education is being provided to students enrolled in the public schools of West Virginia.

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3.3. System Requirements - The system of education shall provide opportunity for every child to develop: literacy skills; technology utilization skills; the ability to perform mathematical functions; the ability to make informed choices among persons and issues that affect his or her governance; the ability to assess self and the total environment to know options and choose life work; the ability to perform in the world of work and post-secondary education; the ability to live a healthy lifestyle; the ability to participate in recreational activities; an understanding of the creative arts; and a sense of responsibility to facilitate compatibility with others in society.

§126-42-4. General Responsibilities.

4.1. The responsibility for developing and implementing high quality education programs is shared as follows:

4.1.1. Responsibility of the West Virginia Board of Education - The West Virginia Board of Education has 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. Given this responsibility, the West Virginia Board of Education shall:

- a. adopt high quality education standards pertaining to all education programs, education personnel development, and related services;
- b. adopt policies providing equal education opportunities for all students that equip them with the skills and knowledge to succeed, to learn throughout their lifetimes, and to attain economic self-sufficiency;
- c. serve as an advocate for a thorough and efficient system of public education;
- d. establish partnerships with higher education, business and industry, labor, and community agencies to assure preparation of graduates for college, other post-secondary education, and gainful employment and to achieve the goals of this policy;
- e. assist county boards of education and other participating agencies in implementing and operating high quality education programs and related services;
- f. receive, disburse, and administer state and federal funds designated for the implementation and operation of education programs and related services;
- g. monitor the implementation and operation of education programs and related student support services to ensure compliance with state and federal laws and policies;

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h. provide an effective mechanism for citizens to register concerns if they believe that elements of a thorough and efficient education program are not being provided pursuant to constitutional provisions, statutes, and/or policy;

i. provide exceptions and consideration for extenuating circumstances, when suitable alternatives are proposed that ensure the attainment of the same or higher standards through the waiver process outlined in W. Va. Code §18-5A-3, and

j. report progress toward attainment of state education goals to the public and the Legislature.

4.2. Responsibility of the West Virginia Department of Education - The West Virginia Department of Education has a primary leadership role in 1) defining and developing the framework for education programs and services, 2) assisting county boards of education to ensure delivery of these programs and student support services, and 3) assuring the West Virginia Board of Education, the Legislature, and the public that a thorough and efficient system of education is being provided. It is the further responsibility of the Department to:

4.2.1. work for and provide staff support to the state superintendent of schools and the West Virginia Board of Education;

4.2.2. provide technical assistance to county boards of education, institutions of higher education, and related agencies;

4.2.3. encourage the use of best practices based on research;

4.2.4. disseminate information concerning the content and implications of standards, policies, and state and federal laws to county boards of education, institutions of higher education, the business community, parents, professional organizations, educational agencies, and other individuals and groups;

4.2.5. develop procedures, guidelines, and technical assistance documents necessary to implement the West Virginia Board of Education policies and state laws;

4.2.6. develop, provide, and participate in programs for professional development;

4.2.7. monitor the implementation of education programs;

4.2.8. administer funds provided and/or authorized by the Legislature and other sources;

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4.2.9. maintain appropriate records and reports on the status of education programs and approved education personnel development programs;

4.2.10. be accountable to the public and the Legislature through the "West Virginia Report Cards"; and

4.2.11. provide recommendations to the West Virginia Board of Education to update a plan for a thorough and efficient system of public education.

4.3. Responsibility of Regional Education Service Agencies (RESAs) - In order to consolidate and effectively administer education programs and service delivery, RESAs shall:

4.3.1. facilitate equality in the education offerings among counties;

4.3.2. seek to deliver high quality education programs at lower per student cost;

4.3.3. reduce administrative and/or operational costs;

4.3.4. maintain a uniform, integrated regional computer information system (West Virginia Education Information System) (WVEIS);

4.3.5. develop and implement staff development programs, and

4.3.6. provide other education or support services as deemed appropriate by the West Virginia Board of Education, the RESA Board of Directors, or required by legislation or policy.

4.4. Responsibility of County Boards of Education - It is the responsibility of each county board of education to plan, deliver, and evaluate the education programs and student support services necessary to implement a thorough and efficient system of public education. The programs of study and student support services mandated by regulations must be made available to all students. In carrying out this responsibility, a county board of education may: 1) cooperate with one or more counties in establishing and maintaining joint programs, 2) use regional services or contract for services with public or private agencies having appropriate programs, and 3) coordinate and share programs, related services, and resources with other organizations, agencies, and local businesses. Regardless of the method chosen, each county board of education shall: 1) collaborate with local business and community groups through establishment of partnerships and a county steering committee; 2) be responsible for conducting a technology needs assessment and establishing a county technology team that will develop a county technology plan for the use of technology to improve instruction (See Policy 2470 and Policy 2450) 3) be responsible for developing a Unified County Improvement Plan and distributing the county board's resources as determined by the plan; and 4) be accountable

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to the public through the annual "West Virginia Report Card."

§126-42-5. Glossary.

5.1. Acceleration - Moving through a prescribed course at a faster or earlier rate. Acceleration includes, but is not limited to, compacted classes/schedules, testing out, early school entrance, double promotion, subject skipping, early graduation, fast-paced curriculum, dual credit courses, and the College Board's Advanced Placement courses.

5.2. Adolescent Education - The education program that addresses the intellectual, physical, social/emotional, and career preparation needs of students across all programs and areas of study in grades 9-12.

5.3. Adult Education - The education program that addresses the intellectual, physical, social/emotional, and career development needs of persons 16 years of age and older who are not enrolled in school.

5.4. Area of Study - A logical subdivision of the subject matter contained within a program of study. For example, geometry and algebra are areas of study within the mathematics program of study.

5.5. The Arts - The programs of study for dance, music, theatre and visual arts.

5.6 Bank Time - Time added beyond the required instructional day which may be accumulated and used in larger blocks of time during the school year for instructional or non-instructional activities. (See Sec. 7.2.14)

5.7. Benchmarks - Indicators for grades K-3 of student progress in learning reading and mathematics; the indicators, when used with available informal assessments, provide teachers and parents with a means to measure whether or not students are progressing satisfactorily in learning the basic skills of reading and mathematics.

5.8. Career Awareness - The opportunity for students to learn about and develop an appreciation of the broad concepts related to work, careers, and educational preparation.

5.9. Career Clusters - Broad grouping of related occupations representative of the type of occupations available in the world of work.

5.10. Career Development - The process through which a student comes to understand the world of work. Kindergarten through fourth grade focuses on career awareness; fifth grade through eighth grade focuses on career exploration; ninth and tenth grade focuses on career exploration and decision-making; and eleventh grade through

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adult focuses on career preparation.

5.11. Career Exploration - The opportunity within the education program for students to conduct self-assessment, access career information, examine multiple career options, and initiate education planning based on a tentative career focus.

5.12. Career Majors - A grouping of occupations with significant commonalities within a career cluster.

5.13. Certificate of Proficiency - A certificate awarded in addition to the high school diploma, containing specific information regarding the graduate's skills, competence, and readiness for further education and employment. (See Sec. 8.2.4)

5.14. Character Education - An integrated and comprehensive approach to promote an understanding and inspire development of general character traits such as respect, responsibility, caring, citizenship, justice and fairness, and trustworthiness. Character Education utilizes existing curricula, along with new and existing projects, programs and activities such as: Responsible Student Program, Respect and Protect, Get Real About Violence, Life Skills Training, Peer Mediation, Conflict Resolution, Student Assistance Teams, etc.

5.15. Class Period - A block of time provided for instruction in a course within a program of study.

5.16. Classroom Management System - The organization of the activities and environment of a classroom that are essential to teaching and learning.

5.17. Co-curricular Activities - Activities that are closely related to identifiable academic programs and/or areas of study that serve to complement academic curricula. (See Sec. 7.3.1.q)

5.18. Concentration - A series of credits directly related to a student's chosen career major and postsecondary goal (pathway). The technical concentrations offered by the school must be aligned with local, state and national job market opportunities.

5.19. Content standards - A broad description of knowledge and skills that students are expected to acquire in a content area.

5.20. Core Academic Programs of Study - The Reading and English language arts, mathematics, science, and social studies programs of study.

5.21. Core Curriculum - The programs of study that, when delivered effectively, enable students to master the knowledge and skills needed to succeed in other programs

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of study, the workplace, college, and other post-secondary education.

5.22. County Steering Committee - A committee that includes parents and representatives from business, labor, higher education, economic development, local school improvement councils (one member from each programmatic level, K-4, 5-8, 9-12), faculty senates (one teacher from each programmatic level, K-4, 5-8, 9-12), students (one from each programmatic level 5-8 and 9-12) and other organizational entities in the community.

5.23. Course - An area of study defined by approved content standards and objectives. The time required for mastery may vary. Schools shall provide reteaching through a variety of strategies which may include, but are not limited to, restructuring the school day, providing extra tutorial sessions, utilizing appropriate technology, extending the school day, and/or extending the school year.

5.24. Developmental Guidance - Planned activities and experiences designed to meet content standards and objectives derived from student needs assessments in the area of self-understanding, self-concept, interpersonal relationships, decision-making, career awareness, career exploration, and educational/career choices. (See Policy 2315)

5.25. Diploma - Formal documentation and recognition that a student has satisfactorily completed the graduation requirements of the state and county school district. A Modified Diploma is awarded when a student, who has severe disabilities, satisfactorily completes modified graduation requirements. Students with severe disabilities are defined as those students with impairments so severe that instructional objectives for required and elective courses are not appropriate, even when delivered in altered form or through different strategies, i.e., changes in delivery, specially designed instructional objectives, teaching strategies, media/resources, and evaluation techniques. The Individualized Education Program (IEP) Team determines if the student is unable to meet the graduation requirements for a regular diploma. The modified graduation requirements are recorded on the student's IEP and Individualized Student Transition Plan.

5.26. Dual Credit Course - Courses that provide students both high school and college credit. Such courses must meet both the specified course content standards and objectives for secondary offerings and the college course requirements.

5.27. Early Childhood Education - The education program that addresses the intellectual, physical, social/emotional, and career awareness needs of learners across all programs and areas of study in grades Pre K-4.

5.28. Education Program - A structure for defining, delivering, and being accountable for a thorough and efficient system of education. This structure is applicable at the state, county, and school levels.

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5.29. Elective Courses - Courses students may choose to study based on need and interest:

5.29.1. Required elective courses must be available to the student sometime during the appropriate programmatic level.

5.29.2. Optional elective courses may be made available by the county board of education, school or other entity based on student need and interest, but they are not required to be made available.

5.30. Enrichment - Instruction that allows the student to study a subject more broadly or in greater depth.

5.31. E-Portal - A web site or service that provides a broad array of resources and services. The Department of Education's E-portal may contain a test item bank, juried and other lesson plans, research and best practice information, links to other sites, and other instructional assistance.

5.32. Extracurricular Time - Time that is not part of the required instructional day or curricular offerings but is under the supervision of the school. It may be used for athletics, non-instructional assemblies, social programs, entertainment and other similar activities. Extracurricular activities may not be scheduled during the instructional day. (See Sec. 7.2.14.c)

5.33. Foundation course - elective courses that enhance students' skills or provide an introduction to further in-depth studies in a technical concentration. These courses are generally offered at the 9th or 10th grade levels. Examples include: technology education; parenting; adult roles and functions; and business courses taken outside of a business-related major.

5.34. Grade/Instructional Level - The class structure that is used to organize and deliver education within West Virginia public schools. The public school education experience is divided into levels, pre K-12.

5.35. Graduation Requirements - Graduation requirements are the number of required and elective units of credit that must be earned by a student in order to be graduated from high school. A diploma is the document that is awarded to a student to verify completion of these graduation requirements. (See Sec. 6.4.13)

5.36. Honors and Advanced Placement - Honors programs expand the academic content in a given program of study and may include, but are not limited to, research and in-depth studies, mentorships, internships, content-focused seminars, and extended instruction in a content area. Advanced Placement courses are advanced in terms of

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content and performance expectations for the age/grade level of students and provide credit toward graduation and possibly college credit upon passing an examination through The College Board.

5.37. Individualized Education Program (IEP) - A written plan, developed by both regular and special educators, parents, related service personnel and the student describing the specially designed instruction needed for an eligible exceptional student to master the content standards and objectives and/or be prepared for the workplace. (See Policy 2419)

5.38. Informal Item Bank - A resource available through the Department of Education's web site/E-portal that provides access to sample test questions from the statewide testing program for the core content programs of study, juried and other lesson plans, research and best practice information, links to other instructional sites, and other instructional assistance.

5.39. Instructional Day - Time allocated within the school day for the teaching and mastery of content standards and objectives. The minimum instructional day for K-4 is 315 minutes, 5-8 is 330 minutes, and 9-12 is 345 minutes. (See Sec. 7.2.12 for the minimum percentage of students who must be in attendance as defined by Policy 4110 in order for the day to be counted as an instructional day.)

5.40. Instructional Goal - See Sec. 5.18, Content standards and objectives.

5.41. Instructional Objective - Incremental step toward accomplishment of a content standard. Objectives usually are organized by grade level.

5.42. Instructional Practices - The strategies, procedures, methods, techniques, and behaviors used by teachers to help students attain the instructional goals and objectives of a program of study.

5.43. Instructional Term - The period of time from the opening of school to the closing of school. The specific dates for each county's instructional term are set by the county board of education and must include a minimum 180 days of instruction. (W. Va. Code §18-5-15)

5.44. Interdisciplinary Area of Study/Instruction - A delivery system integrating instructional goals and objectives from different programs and/or areas of study.

5.45. Juried Lesson Plans - Instructional units, normally web-based, covering any number of class periods, that have been aligned to content standards, reviewed by teachers, and shown to be effective based on actual use in the classroom.

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5.46. Local School Improvement Council - A local advisory group composed of three teachers, three parents, two service employees, the principal, two at-large members appointed by the principal, and one student from a school enrolling students in grade seven or higher. The Council: focuses on improving the education program and operation of the school; has authorization to request waivers of local or state rules, policies, and state superintendent interpretations; assists in the development of the Unified School Improvement Plan; and can apply for grants and awards.

5.47. Middle Childhood Education - The education program that addresses the intellectual, physical, social/emotional, and career exploration needs of students across all programs and areas of study in grades 5-8.

5.48. Partners in Education - Businesses or other community organizations formally linked with an individual school sharing human resources, expertise, and time in a collaborative manner to provide students with enhanced learning opportunities.

5.49. Pathway - Designation of a student's intended postsecondary goal within the five-year education plan and the level and sequence of courses needed to achieve that goal. **Professional** (Baccalaureate Degree or above); **Skilled** (Associate Degree or Postsecondary Certificate); or **Entry** (entry into the workplace directly after high school).

5.50. Performance Descriptors - Narrative descriptions of how well students achieve success on the content standards and objectives. West Virginia has designated three performance levels: distinguished, mastery and partial mastery. Performance descriptors depict student achievement at each of those three levels for each content standard.

5.51. Performance Levels - Levels of student mastery of the content standards and objectives. The levels are "Partial Mastery," "Mastery" and "Distinguished." Performance descriptors for each of these three levels are/will be available for at least the core academic programs of study. A general description of each performance level is listed below:

5.51.1. Distinguished - Superior performance that goes beyond level or course expectations.

5.51.2. Mastery - Solid academic performance in grade level or course expectations. Students demonstrate competency in challenging subject matter, can apply knowledge and skills to real-world situations, and can use analytical skills appropriate to the subject matter.

5.51.3. Partial Mastery - Incomplete mastery of prerequisite knowledge and skills that are necessary for success in the course or grade level.

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5.52. Performance Standards - A system of describing and categorizing student achievement which has four basic components: levels of performance (See Sec. 5.51); performance descriptors (See 5.50); cut scores from statewide assessments that set parameters for the designation of levels of performance; and exemplars of student work for each performance level. West Virginia has designated three performance levels: distinguished, mastery and partial mastery.

5.53. Pre-Kindergarten - The period of time from ages 3 to 5 that is allocated for planned education experiences to address the child's physical, social, emotional, perceptual, and intellectual growth and development. Emphasis is placed on early identification and remediation of physical and intellectual delays in order to enable children to make the most of education opportunities afforded them when they enter kindergarten.

5.54. Process/Workplace Skills - Skills required for success in a career and the workplace including the ability to organize, plan, reason, and use information to solve problems; communicate orally and in writing; work effectively with others; understand and use technology; develop personal skills and attributes; and plan and prepare for a career.

5.55. Program of Study - A curriculum that constitutes the subject matter to be offered. For example, English/language arts, mathematics, social studies, and business education are programs of study.

5.56. Required Basics - The knowledge and skills that are fundamental to learning in all programs of study. Reading, oral and written communication, mathematics, and technology skills are the required basics.

5.57. Required Courses - Those courses that all students must complete.

5.58. Reteaching - Strategies teachers use to ensure mastery of content standards and objectives by all students. The individual school retains the option of selecting and implementing the strategies for the daily reteaching of the students.

5.59. Robert C. Beach Vocational Agriculture Credit - Only students with a declared entry or skilled level major in vocational agriculture (i.e., those whose 5-year plan indicates entry directly into the workforce upon graduation from high school) will, upon their successful completion of a unit of credit in an approved vocational agriculture course above grade 10, be exempt from the third required unit of science credit required for graduation (i.e., the unit above CATS 9 and 10). All other students, including those with declared majors in vocational agriculture at the professional level or who anticipate two-year or four-year college education, are required to take three units of science as defined by this policy and Policy 2520 for graduation.

5.59.1. To be eligible as a required unit for graduation, the vocational agriculture

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education course must: (1) build on the concepts and skills in CATS 9 and 10; (2) be taught at a level of greater complexity and depth than that of vocational agriculture courses in grades 9 and 10; (3) have West Virginia Board of Education approved content standards and objectives; and (4) receive West Virginia Board of Education approval as a vocational agriculture course that qualifies as a Robert C. Beach Vocational Agriculture Credit.

5.59.2. The school shall: (1) have on file a Parental Consent Form with signatures of the student, parent(s), and authorized school official that acknowledges the understanding that this class does not represent a substitute for the knowledge, skills and competencies of a third unit of science and that this course does not meet the requirement for the additional unit of laboratory science that West Virginia colleges and universities have for admission; and (2) review with the student and his/her parents, as verified by the Parental Consent Form, that the required third unit of science must be successfully completed if a student should change his/her major from entry or skilled level vocational agriculture education prior to graduation from high school.

5.60. School Day - The time, inclusive of homeroom, class changes, breaks/recess, lunch, and other non-instructional activities from the first designated assembling of the student body in groups (homeroom or first period) to the dismissal of the student body.

5.61. School Improvement - a continuous process to improve student learning opportunities and student achievement. School improvement involves building the capacity of teachers, administrators, service personnel, students, parents, and community members. School improvement is not a destination, but a constant effort to improve student learning.

5.62. Semester - A block of instructional time that is equivalent to at least one-half of the school year. For example, 90 instructional days are equal to a semester in a traditional school term of 180 instructional days.

5.63. Subject - A synonym for an area of study. For example, subject may refer to algebra, economics, or literature.

5.64. Technology Integration - The use of programs of study to help students understand and use technology, and the use of technology to help students master the programs of study.

5.65. Unified County Improvement Plan - A plan that specifies how the county school system intends to strengthen the county education program in order to increase student achievement. The plan must be developed through a strategic planning process that incorporates data from the Unified School Improvement Plans of the system's schools. (See Sec. 8.3.1.)

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5.66. Unified School Improvement Plan - A plan that specifies how the school intends to increase student achievement. The plan must be developed through a strategic planning process and must be based on all available data regarding student achievement. (See Sec. 8.4.1.)

5.67. Unit of Credit - Recognition given to a student for the successful demonstration of mastery of the content standards and objectives at a level established for an approved required or elective high school level course. Partial credit ($\frac{1}{2}$ unit) may also be awarded. The level of mastery shall be determined by the county board of education. Individual students who demonstrate mastery of the content standards and objectives of a particular course must be provided opportunities to progress to the next level. Credit shall also be granted for documented mastery of high school course requirements by a student prior to grade nine or for successful completion of a dual credit course.

5.68. Virtual School - The West Virginia Virtual School was created within the Department of Education by the West Virginia Legislature to provide a variety of high quality, technologically delivered courses for K-12 public school students. The Virtual School initiative will help bridge the barriers of time, distance, and inequities for all West Virginia students by providing access to resources. The Virtual School offers required courses, Advanced Placement courses and a variety of elective, enrichment, remediation and Information Technology (IT) courses.

5.69. West Virginia Report Card - Information provided to parents and the general public on the quality of education in the public schools that is uniform and comparable among schools within and among the various school districts as defined in W. Va. Code §18-2E-4.

5.70. Work Based Learning - Education activities that assist students to gain an awareness of the workplace; develop an appreciation of the relevance of academic subject matter to workplace performance; and gain valuable work experience and skills while exploring career interests and abilities.

5.71. Work Day - Time allocated for the instructional day and other activities such as homeroom, class changes, lunch, planning periods, and staff development that may not exceed eight clock hours.

§126-42-6. Program Definition.

6.1. The education program offered in West Virginia's schools is defined in broad terms as all of the education activities that take place during the school day and the school year. The education program provides education opportunities for students to master the basic skills and to develop the broader knowledge and skills necessary to function effectively in responsible adult roles. The education program is based upon the best

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information available regarding effective practices and information that is provided through responsible research so that the program of education is efficient and effective. The education program is structured and based on four programmatic levels: early childhood education, middle childhood education, adolescent education, and adult education. Within those programmatic levels, the education program includes the programs of study that make up the curriculum, instructional practices, and student support services.

6.2 Each county board of education shall establish policies and implement written procedures to define its education program in accordance with the definitions and requirements that follow.

6.3. Programmatic Levels - The education program must be based on the following four stages of student development and maturity.

6.3.1. Early Childhood Education (Grades Pre K-4) - Early childhood education is the beginning of formal education in West Virginia public schools. Pre-kindergarten and kindergarten provide developmental activities designed to stimulate the intellectual, physical/motor and social/emotional development of the child and begin the process mastery of the required basics. The education program in grades 1 and 2 gives priority to the mastery of the required basics of reading, writing, mathematics, and computer skills and reinforces the developmental activities with emphasis on integration of career awareness and the use of other technology skills.

6.3.2. Middle Childhood Education (Grades 5-8) - Middle childhood education builds upon the results of early childhood education and provides education opportunities to help students; extend competence in basic skills; develop self-understanding, self-knowledge, independence and interdependence; and engage in exploratory experiences in academic areas and careers. The middle childhood education program builds on and emphasizes extension of the basic skills, including technological skills, broadening of academic skills to assist students in making the transition from childhood to adolescence and experiencing career exploration to develop individual student transition plans for grades nine and ten.

6.3.3. Adolescent Education (Grades 9-12) - Adolescent education provides students the intellectual, social/emotional, physical, and technological capacities for successful entry into adulthood. The adolescent education program provides challenging and rigorous courses in the programs of study that will enable students to achieve high levels of competence so they can complete graduation requirements and be prepared to successfully enter and compete in the workplace and in post-secondary education. Students in the adolescent education program will have the opportunity to examine a system of career clusters and to select and complete a career major.

6.3.4. Adult Education - Adult education is designed to meet the education,

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employment and training, economic, civic, cultural, social, and recreational needs of adults in the community served by public schools. These programs are offered by county boards of education or regional education service agencies and are described in Chart VI.

6.4. Programs of Study - Programs of study establish the content and skills (what students should know and be able to do) around which the instructional program is organized and delivered. Programs of study are introduced, emphasized and delivered in different ways at the four programmatic levels. Some programs of study are required to be taken by all students and others are required to be offered to students. The following factors must be addressed as each county board of education defines its programs of study:

6.4.1. The programs of study identified in Charts I-IVB must be available to and be taken by all students as noted in the charts.

a. Transfer Students - Students who transfer into a West Virginia school that has higher graduation requirements may not be able to complete these requirements. In such cases, the student's credits shall be evaluated to determine if one or more county and/or state requirements will be waived by the county or state superintendent.

b. Continuous Enrollment - If a student has been enrolled continuously in grades 9-12, the student shall be expected to meet the graduation requirements that were in effect when he or she entered ninth grade.

c. Re-enrollment - If a student has enrolled after dropping out of school, the requirements that a student must meet depend upon the length of time he or she has been out of school. If the student has been out of school less than one year, he or she would be expected to complete the graduation requirements that were in effect when he or she entered grade nine. If the student has been out of school one year or more, he or she would be expected to complete the current graduation requirements.

6.4.2. The courses needed for graduation (Charts IVA and IVB) require mastery of the West Virginia Board of Education and county board of education approved content standards and objectives. The county board of education shall determine the level of mastery which constitutes successful completion of a course.

6.4.3. Additional programs of study not identified in Chart V may be offered to afford students the opportunity to attain mastery of the content standards and objectives, to broaden and enrich their education, and to support academic and career development.

6.4.4. Any elective offering must be based on West Virginia Board of Education approved content standards and objectives if available or on written content standards and objectives that are approved by the county board of education.

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6.4.5. Chart VI identifies programs of study that provide lifelong learning opportunities for adults so that they may maintain, acquire, or enhance functional and/or technical literacy.

6.4.6. Students shall receive credit for courses based on tested mastery or demonstrated mastery of the content standards and objectives associated with successful completion of a course for which at least 8100 minutes of instructional time per unit of credit (or at least 4050 minutes per ½ unit) have been scheduled or otherwise approved by the WV Virtual School. Each county board of education shall adopt and implement a policy governing tested mastery which addresses at least the following issues:

a. The option to demonstrate mastery through a test is available only for high school credit.

b. The intent of the "testing out" option is to give students time to pursue higher level studies if they have already mastered prerequisite knowledge and skills.

c. A testing "window" shall be established as part of the test management system.

d. Criteria shall be established to determine if a student qualifies to take a particular test. Criteria shall include the student's past performance in courses in that discipline.

e. Each test is developed by educators who are appropriately credentialed.

f. The test reflects the totality of the state and local content standards and objectives for the course credit to be awarded.

g. The test provides students an appropriate opportunity to demonstrate mastery of the entire course through a variety of types of questions, a range of levels of questions, and performance-based methods appropriate to the discipline.

h. Procedures for handling, scoring and storing of tests shall be conducted in a manner consistent with procedures outlined in the Testing Code of Ethics/Security Agreement that has been distributed to all county test coordinators and superintendents.

6.4.7. Students who demonstrate mastery of content standards and objectives must be provided opportunities to progress to the next level of instruction.

6.4.8. Technology must play a major role in the delivery of all programs of study. Technology will be used as part of the delivery process for instruction and providing

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information for students. The use of technology, particularly computers, will also be a part of the curriculum so that students develop skills and know how to use technology as an effective tool for learning, processing information, and communicating information to others.

6.4.9. County boards of education must make a variety of career cluster options available to students in order to ensure that students understand the breadth and scope of careers in the world of work.

6.4.10. Linkages must be established that enable school personnel and businesses to provide work-based experiences to support and enhance the programs of study and career development of each student.

6.4.11. Accepting Credits Earned Before Grade 9 - Any student who successfully completes a high school level course prior to grade nine shall receive full credit for that course toward graduation requirements. The student's permanent record for grades 9-12 shall indicate completion of the courses. The grade for any course taken prior to grade nine becomes part of the student's permanent record and is calculated in the student's GPA (grade point average).

6.4.12. County boards of education shall adopt policies that allow students to earn credit for completion of college work. If these credits are to be used to meet graduation requirements, they must meet the requirements for a dual credit course. (See Sec. 5.26)

6.4.13. Graduation Requirements - The state graduation requirements total 24 credits. See Charts IV (A) and IV (B) for specific credits required for graduation.

6.4.14. Authority for County Boards of Education to Increase Graduation Requirements. County boards of education have the authority to increase these requirements for schools in their counties. The county superintendent shall notify the West Virginia Department of Education of any changes in requirements beyond the state requirements.

6.4.15. Grades on end-of-course examinations - The second year that end-of-course examinations are implemented as part of Policy 2340, the grade received by the student on any of those examinations shall constitute no less than 15% of the student's grade for the course.

6.4.16. Attendance - The following rules shall govern student attendance in grades 9-12:

a. Attendance for the full school day for all four years during grades 9-12 is important so that students obtain the full benefit from the educational programs offered in

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the schools of West Virginia. Therefore, all students shall be scheduled for the full instructional day for all four years. Exceptions may be made by county boards of education to accommodate placement in college courses, advanced vocational/technical programs, participation in the WV Virtual School, or for other compelling circumstances.

b. County boards of education shall develop and implement a policy that defines the circumstances under which students may attend school for fewer than four full years and/or may be scheduled for courses for less than the full instructional day. The policy must be approved by the state superintendent.

c. Each county shall submit an annual attendance report to the Department of Education covering each school housing students in any grade 9 through 12. The report shall list the number of students in each of those schools scheduled for less than the full instructional day and the reasons, based on the county policy, for the exceptions granted. The report shall also list the total number of students in each school who have been granted exceptions to the requirement that they attend school for four full years and the reasons, based on county policy, for the exceptions granted.

d. The Department of Education shall submit an annual report to the West Virginia Board of Education summarizing the attendance reports received from the county school systems.

Chart I

Early Childhood K-2

These core programs of study shall be taught daily with a reteach component ensuring mastery of the content standards and objectives. Reteaching is to occur daily for those students needing more help.

Reading and English Language Arts

Mathematics

These required programs of study may be taught as separate or integrated programs but need not be taught daily.

Science

Social Studies

Art

Music

Physical Education

Health

Components of career awareness and the application of technology shall be included during instruction in all subjects.

The study of foreign language is encouraged.

Students demonstrating mastery of instructional grade level objectives in the programs of study are to be provided the opportunity to advance to the next grade level objectives.

Chart II

Early Childhood 3-4

These core programs of study shall be taught daily with a reteach component ensuring mastery of the content standards and objectives. Science and Social Studies may be taught as separate or integrated programs. Reteaching is to occur daily for those students needing more help.

Reading and English Language Arts
Mathematics
Science
Social Studies

These required programs of study may be taught as separate or integrated programs but need not be taught daily.

Art
Music
Physical Education
Health

Components of career awareness and the application of technology shall be included during instruction in all subjects.

The study of foreign language is encouraged.

Students demonstrating mastery of instructional grade level objectives in the programs of study are to be provided the opportunity to advance to the next grade level objectives.

Chart III

Middle Childhood 5-8

These core programs of study shall be taught daily with a reteach component ensuring mastery of the content standards and objectives. Schools implementing alternative schedules will provide equivalent instructional time for these programs of study.

Reading and English Language Arts
Mathematics
Science
Social Studies

These required programs of study shall be taught at each grade level each year as separate subjects.

Art
Music*
Physical Education
Health

These required programs of study shall be taught annually.

Career Exploration**
Developmental Guidance***
Foreign Language****

Career awareness and the application of technology shall be taught in all programs of study. Students demonstrating mastery of instructional grade level objectives in the subjects are to be provided the opportunity to advance to the next grade level objectives.

* Choral and instrumental music must be offered no later than grade six.

** These experiences based on content standards and objectives must be provided to students during grades five through eight and may be integrated or taught as a separate course. Where feasible, consideration should be given to using modular technology education labs to enhance career exploration.

*** This may be integrated or taught as a separate course.

**** Foreign language is encouraged to be taught as a separate program in grades five and six. Two years of the same foreign language must be offered for students in grades seven and eight. The foreign language(s) chosen to be offered must be taught at the high school the middle school students will attend. Schools may choose from two learning sequences:

1. 7th grade exploratory course(s)/8th grade Level I of the foreign language. Students will receive one high school credit at the end of 8th grade upon mastery of the content standards for the Level I course.

2. 7th grade Level IA of the foreign language/8th grade Level IB of the language. The Level I course is delivered over a two year period. Students will receive one high school credit upon mastery of the content standards for the course.

Chart IV (A)

Adolescent 9 - 12

These graduation requirements are effective for students entering grade 9 in the school years 1999-2000 through 2004-2005.

Requirements for Graduation

English Language Arts

4 credits

English 9, 10, 11, 12

Mathematics*

3 credits

Two of the three credits will be Algebra I and above.

Science**

3 credits

Coordinated and Thematic Science 9, Coordinated and Thematic Science 10, and one course above Coordinated Thematic Science 10 level.

Social Studies

3 credits

United States to 1900, World Studies to 1900, and Twentieth/Twenty-First Centuries

Physical Education

1 credit

Health

1 credit

The Arts

1 credit

Career Majors***

4 credits (Career majors are to be determined at the local school or county level.)

Electives

4 credits (chosen from the school's offerings of electives)

Work-based Learning****

(Work-based Learning will be determined at the local level.)

Credit is to be awarded based upon either demonstrated mastery of the content standards and objectives through successful completion of the course or through tested mastery of approved contents standards. (See Sec. 6.4.6.) The county board of education shall determine the level of mastery which constitutes successful completion of a course.

Students demonstrating mastery of instructional grade level objectives in the subjects are to be provided the opportunity to advance to the next grade level objectives.

* Successful completion of Applied Math I and II is equivalent to an Algebra I credit. Applied Geometry may be substituted for a formal course of geometry.

** With parental consent, students with a declared entry or skilled level major in vocational agriculture will, upon successful completion of a Robert C. Beach Vocational Agriculture credit in grade 11 or 12, be exempt from the third required unit of credit in science. (See Sec. 5. 59.)

*** Prior to students selecting career majors, opportunities for career decision making must be provided.

**** The decision regarding credit for the experiences at grades 9 - 12 will also be made at the local level.

All students are strongly encouraged to complete two credits in a foreign language. Elective offerings not based on West Virginia Board of Education content standards and objectives must have written content standards and objectives approved by the county board of education.

Chart IV (B)

Adolescent 9 - 12

These graduation requirements are effective for students entering grade 9 in the school year 2005-2006 and thereafter.

Requirements for Graduation

CORE REQUIREMENTS (17 CREDITS)	
<p>English Language Arts 4 credits <i>English 9, 10, 11, 12</i></p> <p>Mathematics* 3 credits <i>Two of the three credits will be Algebra I and above</i></p> <p>Science** 3 credits <i>Coordinated and Thematic Science 9, Coordinated and Thematic Science 10, and one course above Coordinated and Thematic Science 10 level</i></p>	<p>Social Studies 4 credits <i>United States to 1900, World Studies to 1900, Twentieth and Twenty-First Centuries Civics</i></p> <p>Physical Education 1 credit</p> <p>Health 1 credit</p> <p>The Arts 1 credit</p>

- * Successful completion of Applied Math I and II is equivalent to an Algebra I credit. All students must take Algebra I or its equivalent prior to the end of tenth grade. Applied Geometry may be substituted for a formal course of geometry.
- ** With parental consent, students with a declared entry or skilled level major in vocational agriculture will, upon successful completion of a Robert C. Beach Vocational Agriculture credit in grade 11 or 12, be exempt from the third required unit of credit in science (See Sec. 5.59.)

CAREER MAJOR CREDITS (4 Credits)		
Professional Pathway	Skilled Pathway****	Entry Pathway****
Mathematics 4 th credit which must be above Algebra I*** Natural Science 4 th credit Foreign Language 2 credits in one language	Mathematics 4 th credit which must be above Algebra I*** Concentration 3 credits*****	Concentration 4 credits*****

*** These students must earn four credits in mathematics including Algebra I and two other courses above Algebra I. See Secs. 8.2.6.D, E and F for a process allowing students and their parent(s) to substitute other career major credits for these credits. The student and his/her parents, when choosing to substitute other courses, must sign a form stating that they understand that in so choosing the student will not meet admission requirements for a baccalaureate degree program at any West Virginia public college or university.

**** The four concentration units provided students in entry-level technical majors and two of the concentration units at the skilled level must be consistent with those defined in the Required Technical Courses by Career Major technical assistance document published by the Department of Education.

***** Each technical concentration in a school shall obtain and maintain an appropriate industry recognized accreditation/certification, when one is available, and shall provide students the opportunity to obtain that industry-recognized credential as part of the instructional program.

ELECTIVES*** (3 Credits)**

The remaining graduation requirements are to be electives.

WORK-BASED LEARNING

All students must participate in a work-based learning experience at some time in grades 9-12. The decision whether to grant credit for these experiences will be made at the local level. (See Section 7.2.9)

CAREER DEVELOPMENT

Prior to students selecting career majors, opportunities for career decision-making must be provided in grades 9-10.

Chart V

Electives

Adolescent 9-12

	ELECTIVES REQUIRED TO BE OFFERED	OPTIONAL ELECTIVES
	These courses must be offered at least in alternating years (Effective 2005-2006) These courses are in addition to those required for graduation	These courses (or others) may be offered depending on need or student demand
READING AND ENGLISH/LANGUAGE ARTS	Journalism/Newspaper/Yearbook Speech	Desk Top Publishing English college courses AP English Creative Writing Library/Media Technical Writing Broadcast Journalism
MATHEMATICS	Algebra II Algebra/Geometry Preparation Applied Mathematics I and II Geometry/Applied Geometry Pre-Calculus Trigonometry	Calculus Conceptual Mathematics Mathematics college courses AP Mathematics Probability and Statistics
SCIENCE	Advanced Biology (11-12) Advanced Chemistry (11-12) Advanced Environmental/Earth Science (11-12) Advanced Physics (11-12) Human Anatomy and Physiology	Science college courses AP Science Biology -Technical Conceptual (11-12) Chemistry - Technical Conceptual (11-12) Physics - Technical Conceptual (11-12)
SOCIAL STUDIES	Economics Geography	AP Social Studies Social Studies college courses

FOREIGN LANGUAGE	Three levels of one foreign language	Other foreign languages based on student need and interest
HEALTH	Any courses required to satisfy a career major	Other health courses based on student need and interest
PHYSICAL EDUCATION	Any courses required to satisfy a career major	Other physical education courses based on student need and interest
THE ARTS	Four sequential levels of student achievement in music (both choral and instrumental), visual art (general art and/or studio art), dance, theatre	Other courses in the arts based on student need and interest
CAREER MAJORS	Four specified courses within a major/pathway	Other courses based on student need and interest
DRIVER EDUCATION	One course	Other driver education courses based on student need and interest
TECHNICAL EDUCATION Note: Schools must provide students access to skilled and entry-level technical preparation in a minimum of four of the following career clusters: 1. Health 2. Business/Marketing 3. Science/Natural Resources 4. Engineering/Technical 5. Human Services	80% of students in grades 9-10 must have access to at least one vocational-technical foundation course. One foundation course must be offered that teaches parenting skills	Other courses in technical education based on student need and interest:
	30% of students in grades 11-12 must have access to four units in a technical concentration and two technical electives	Other courses based on student need and interest:
	An additional 30% of students in grades 11-12 must have access to two units in a technical concentration	Other courses based on student need and interest
CAREER DEVELOPMENT	Students must be provided opportunities for in-depth exploration of their chosen career cluster in grades 9-10 through formal coursework, web-based or independent studies, or other alternative means:	

CHART VI
Adult Education Programs*

Adult Basic Education (ABE)	Vocational and Technical Education Full- and Part-Time Classes	Job Specific Services to Business and Industry
<ul style="list-style-type: none"> ● Basic Literacy ● Basic Skills Assessment ● General Educational Development (GED) Preparation ● Distance Learning ● External Diploma Program (EDP) ● English as a Second Language (ESL) ● Correctional Literacy Programs ● Family Literacy Programs ● Test Preparation for employment, college, military-entrance exams ● Career Exploration 	<p>Technical training is provided to assist adults seeking employment or enhancing their current employment.</p> <ul style="list-style-type: none"> ● Industrial and Technical ● Computer Science ● Business Education ● Wood Products Technology ● Aqua Culture ● Hospitality ● Health Care 	<ul style="list-style-type: none"> ● Workplace Education Programs ● Job/Task Analysis ● Training Material Development ● Training Video Production ● Technical Skill Training ● Supervisory Training ● Train-the-Trainer Program ● Customized Skills Development Classes ● Employee Assessment/ Selection Service ● Use of Vocational Facilities/Equipment ● Referral to Other Agencies
Workforce Development Training for Special Populations	Public Service Training	
<p>Academic skills and technical training are provided for economically and community development.</p> <ul style="list-style-type: none"> ● Referral to Other Agencies ● Hit the Ground Running ● Trade Readjustment Act ● Clean Air Act ● North American Free Trade Agreement 	<ul style="list-style-type: none"> ● Emergency Medical Training ● Wastewater and Water Training ● Firefighting Training ● Hazardous Material Training 	

*To be delivered consistent with Policy 2420.

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6.5. Content standards and objectives - The education program must identify and sequence, within each program of study, the specific content standards and objectives that are to be taught in the schools of the county in order to assist teachers in organizing and delivering instruction.

6.5.1. The curricula at the county and school levels must be based upon approved content standards and objectives.

6.5.2. Curriculum Alignment - Each school must, with the feeder school(s) from which it receives students, and/or with the school(s) to which it sends students, develop a system for making certain that the curriculum provided in all of the schools is aligned and that, together, the schools provide students the opportunity to master the content standards and objectives.

6.5.3. Instruction at the county and school levels is modified when necessary to accommodate the educational needs of eligible exceptional students and other students with special needs.

6.5.4. Functional skills necessary to make a successful transition to adult life are based upon approved content standards and objectives and are provided to individual students with severe disabilities in accordance with their Individualized Education Programs (IEPs).

6.6. Student Support Services - County boards of education must provide student support services to ensure that students are able to participate in and benefit from a high quality education program. These services include, but are not limited to: guidance and counseling, health services, library/media services, school psychological services, special education and related services, social services and attendance, transportation services, and nutrition services.

6.6.1. Guidance and Counseling - School counselors work with individual students and groups of students through developmental, preventive and remedial approaches at least 75 percent of their time to meet academic, social, emotional, and career development needs as required in W. Va. Code §18-5-18b. This includes identifying and addressing the problems of potential school dropouts. Developmental guidance programs focus on career development and preparing students to function more effectively in school, at work, at home, and in the community.

6.6.2. School Health Services - School health services provide early identification of health problems and follow-up activities to facilitate and assure appropriate health/medical care as required in W. Va. Code §18-5-22. Emphasis is placed on preventive services and health education to reduce absenteeism and academic failure and

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promote lifelong health-enhancing behaviors.

6.6.3. Library/Media Services - Today's technological society requires access to media and use of such skills as retrieving, receiving, and using information. Each county board of education will determine the library media services to be made available within its budget.

6.6.4. School Psychological Services - School psychological services facilitate the interpersonal and academic development of all students and foster the social and emotional health of students. School psychologists assist teachers and other school personnel with assessment information, behavior intervention plans, safe schools information, test taking skills, and reduction of test anxiety.

6.6.5. Special Education and Related Services - Specially designed instruction, at no cost to parents, to meet the unique educational needs of an eligible exceptional student, including instruction conducted in the classroom, in the home, in hospitals and institutions, and in other settings, and instruction in physical education. The term includes speech-language pathology services, vocational education, and any other related service, if the service consists of specially designed instruction to meet the unique needs of a student with an exceptionality. Related services include, but are not limited to: transportation and such developmental, corrective and other supportive services as are required to assist an eligible exceptional student to benefit from special education; assistive technology; audiology; speech and language pathology; psychological services; physical and occupational therapy; clean intermittent catheterization and other procedures as defined in Policy 2422.7 and the Basic and Specialized Health Care Procedure Manual for WV Public Schools; recreation; orientation and mobility services; social work services in schools; school health services; early identification and evaluation of disabling conditions in students; medical services for diagnostic or evaluative purposes only; and parent counseling and training.

6.6.6. Social Services and Attendance - W. Va. Code §18-8-3 requires compulsory school attendance to begin with the school year in which the sixth birthday is reached prior to September one of such year or upon enrolling in a publicly supported kindergarten program and to continue to the sixteenth birthday or for as long as the student continues to be enrolled in a school system after the sixteenth birthday. County boards of education must employ a full-time attendance director if the county has a net enrollment of more than four thousand pupils and at least a half-time director if net enrollment is less than four thousand. (W. Va. Code §18-8-3)

6.6.7. Transportation Services - Each student who requires county board provided transportation shall have safe, efficient transportation to the extent necessary to assure the opportunity to participate in the county education program. (W. Va. Code §18-5-13)

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6.6.8. Nutrition Services - W. Va. Code §18-5-37 requires county boards of education to provide a breakfast program. In addition to the breakfast program, school nutrition services provide balanced meals for all students who choose to participate in the program and help students develop sound nutritional habits. All schools must serve meals that are nutritionally adequate.

6.7. Co-curricular and Extracurricular Activities.

6.7.1. Schools must implement, in an equitable manner, co-curricular and extracurricular programs, at the appropriate instructional levels, that contribute to the success of students.

6.7.2. Co-curricular activities may take place during the instructional day.

6.7.3. Extracurricular activities shall occur outside of the instructional day. See, however, Sec. 7.2.14.c.

6.8. Student Assistance Teams - Each public school shall establish a student assistance team that:

6.8.1. Consists of at least three (3) persons, including a school administrator or designee, who shall serve as the chairperson, a current teacher(s), and other appropriate professional staff.

6.8.2. Reviews individual student needs when a student demonstrates poor academic performance and/or engages in disruptive behavior, and either recommends appropriate instructional and/or behavioral intervention strategies within the regular education program or refers immediately for multi-disciplinary evaluation.

6.8.3. Invites parents to review recommendations made by the team in regard to the child's program and to provide feedback to the team about those recommendations.

6.8.4. Reviews, no later than one grading period after implementation (or as otherwise specified), the effectiveness of the instructional and/or behavioral intervention strategies to determine the need for continuation, modification, and/or termination of educational interventions or the need to refer for multi-disciplinary evaluation.

6.8.5. Is trained in appropriate instructional and behavioral intervention strategies, and referral procedures.

6.8.6. Collects and maintains data on the activities of the team, including the dates of meetings, the members in attendance, the recommendations of the team, the dates of review meetings, and the results of the interventions.

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§126-42-7. Program Delivery.

7.1. The county board of education shall establish policies and implement written procedures to provide high quality delivery of its education program. In meeting this responsibility the county board shall address the components of a high quality program listed below.

7.2. Administrative Practices.

7.2.1. Ensure that all students ages 6-16 are attending public schools or are exempted from compulsory school attendance under provisions of W. Va. Code §18-8-1a.

7.2.2. Provide a rigorous and relevant curriculum based on the West Virginia Board of Education approved content standards and objectives in the required basics to ensure that each student has the opportunity to:

- a. Perform at the mastery level in reading and mathematics by the end of third grade;
- b. Attain mastery of the basic skills in reading, writing, mathematics and technology;
- c. Attain the basic skills necessary for success in post-secondary education and the workplace.

7.2.3. Ensure that all schools are safe and that the environment is conducive to learning.

7.2.4. Organize school calendars and schedules to maximize academic learning time and provide reteaching through a variety of strategies which may include, but are not limited to, restructuring the school day, providing extra tutorial sessions, utilizing appropriate technology, extending the school day, and/or extending the school year.

- a. The school calendar shall meet the requirement of W. Va. Code §18-5-45.

7.2.5. Put procedures in place at the county and school level to ensure that test data are used to identify student learning needs and that those learning needs are appropriately addressed through reteaching and improving instruction.

7.2.6. Develop a Unified County Improvement Plan or an equivalent strategic plan based on information from the Unified School Improvement Plans. (See Sec. 8.3.1.)

7.2.7. Appoint and maintain a county school system or multi-county technical center advisory council that meets on a regular basis to provide advice on current and

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future employment needs and on the relevancy of courses being offered. Each technical concentration must have a program area advisory council that meets on a regular basis to advise on course content, including which skills should be taught, instructional materials and equipment needed, and standards which should be met to assure student employability or preparedness for further education.

7.2.8. Appoint and maintain a county steering committee that includes parents and representatives from business, labor, higher education, economic development, local school improvement councils (one member from each programmatic level, K-4, 5-8, 9-12), faculty senates (one teacher from each programmatic level, K-4, 5-8, 9-12), students (one from each programmatic level 5-8 and 9-12) and other organizational entities in the community.

a. The county steering committee will act as a partner with the county board in developing and implementing high quality preparation of youth for college, other post-secondary education and gainful employment;

b. The membership or designated representatives may serve, to the extent appropriate, on the community technical college district consortia committee as established in W. Va. Code §18B-3-3a;

c. The committee may also advise the county board of education in developing the Unified County Improvement Plan; and

d. The committee may also act as the Council on Productive and Safe Schools if it meets the stipulations for membership outlined in W. Va. Code §18-5-42.

7.2.9. Provide work-based learning experiences for each student at some time in grade 9, 10, 11 or 12. In order to qualify as a work-based learning experience within the meaning of this section, the experience must have the demonstrated ability to help students attain process/workplace skills (See Sec. 5.54). Counties with few employers must identify and utilize alternative strategies, such as simulated workplace situations, community service, and school-based enterprises to provide such opportunities. Each county board of education shall:

a. establish a procedure for coordinating work-based learning experiences;

b. establish criteria for selecting quality work-based learning experience and sites;

c. establish criteria and standards that students must meet to be eligible for work-based learning experience;

d. establish goals and objectives for the different types of work-based learning experiences;

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e. establish process and criteria for work-based experiences that merit the awarding of credit; and

f. provide staff development for coordinators, mentors, and supervisors of work-based learning experiences.

7.2.10. Ensure that each school has established and is implementing:

a. a process to maintain a safe climate conducive to learning that enhances the physical, social, and emotional well being of students;

b. a process to ensure that parents are involved in the school and their child's education;

c. a process for flexible staff scheduling to ensure that maximum opportunity for re-teaching and remediation is available for students.

d. a process and procedures for providing professional development to ensure implementation of methodologies and best practices for strengthening the rigor, content, and relevance of the learning process;

e. instructional practices that are based on the best information from research and successful practices;

f. a "Code of Conduct" policy that addresses absences, tardiness, and misbehavior at the school and classroom levels and enhances student learning of responsible behavior;

g. a rigorous curriculum that is coordinated and sequenced so all teachers are aware of the instruction students receive prior to entering the grade level they teach and what the expectations are for students to be able to succeed at the next grade level;

h. a policy for student homework;

i. a policy for grading;

j. a system for monitoring and assessing pupil performance related to the content standards and objectives of the school education program;

k. an adequate continuing record of student progress for student, parent, and teacher information;

l. a system to monitor dropout rates and, when appropriate, plans to reduce the student dropout rate;

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m. a process for timely, accurate, and complete entering of data into the West Virginia Education Information System;

n. technology practices that facilitate student development in areas such as, but not limited to, computer skills, critical thinking and decision-making, application of academic knowledge in workplace programs, and making informed career decisions;

o. a school technology team to develop a comprehensive technology plan that includes instructional and academic content standards and objectives as a component of the Unified School Improvement Plan. (See Policy 2470);

p. a technology infrastructure that has multiple applications in enabling students to achieve at higher academic levels;

q. a local school improvement council as outlined in W. Va. Code §18-5A-2 that facilitates improvement of educational quality by encouraging the involvement of the school community in the operation of the school and by utilizing the waiver process when appropriate;

r. a faculty senate that facilitates school improvement through practices outlined in W. Va. Code §18-5A-5;

A. Each county board of education shall, as provided in W. Va. Code §18-5A-(b)(12), provide to each faculty senate either a two-hour per month block of instructional time within the instructional day or an unlimited block of time per month during non-instructional days.

B. A faculty senate scheduled on a non-instructional day shall be considered as part of the purpose for which the non-instructional day is scheduled.

s. a school curriculum team that establishes the programs and methods for implementing a curriculum based on state approved content standards and objectives and based on the needs of the individual school with a focus on reading, writing, mathematics, and technology;

t. a continuous system of program assessment, accreditation, and program improvement; and

u. a Unified School Improvement Plan (or equivalent strategic plan) that is based on the identified needs of the students and is developed collaboratively by the local school improvement council, the principal, faculty senate, school technology team, and school curriculum team. (See Sec. 8.4.1.);

7.2.11. Require, prior to the beginning of each school year, that the principal and

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teachers at every school determine time allocations within the regular and alternative school calendars for specific instructional programs based on the needs of students.

7.2.12. Provide, at a minimum, an instructional day 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. A minimum of 75% of the students in a county must be in attendance, as defined by Policy 4110, in order for the day to be counted as an instructional day.

a. Absences that result from school-approved curricular, co-curricular or extra-curricular activities or failure of the bus to run/hazardous conditions shall not be counted in the calculation of attendance.

7.2.13. A county board of education that proposes to schedule class periods in a manner that results in fewer than 8100 minutes of instructional time allotted for a high school course credit must obtain a waiver from the State Board prior to implementing such a schedule. Courses approved through the WV Virtual School approval process may be exempt from this requirement. County and multi-county vocational centers may, in order to accommodate transportation times for students, schedule courses for credit with fewer than 8100 minutes of instructional time provided the center documents student mastery of the content standards for those courses.

7.2.14. Use bank time in a responsible fashion.

a. Bank time is time added beyond the instructional day required in Sec. 7.2.12 which may be accumulated and used in larger blocks of time during the school year for instructional or non-instructional activities.

b. Bank time may not be used to avoid 180 separate days of instruction. For example, bank time may not be used to convert a complete day of instruction into a day to be used for some other purpose. Bank time may not be used to lengthen the time provided in law for faculty senates.

c. Bank time may be used for extra-curricular activities provided that the extra-curricular activities, taken all together during the course of a school year, account for no more than one percent of the total instructional time available. Extra-curricular events sponsored or sanctioned by the West Virginia Secondary School Activities Commission (WVSSAC) and regular season athletic events are not to be considered in computing the one percent figure. Travel time for students participating in extra-curricular events sanctioned or sponsored by the WVSSAC and in regular season athletic events is not to be considered in computing the one percent figure.

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d. Co-curricular activities may, by their nature, be scheduled without regard to the use of bank time.

7.3. Instructional Practices.

7.3.1. Each teacher and each school must implement a system for delivering classroom instruction and designed to increase student achievement and that prepares each student for success in post-secondary education and the workplace. The system must align instructional practices, instructional materials, assessment and staff development. In implementing an aligned system of instruction, the teachers:

- a. set, maintain and communicate high expectations for all students;
- b. base the instructional program on county or state approved content standards and objectives;
- c. teach all of the content standards and objectives in each grade level and in each subject;
- d. assess student performance and use that information to plan instruction for students;
- e. provide severely disabled students with functional skills, based upon approved contents standards, that are necessary to make a successful transition to adult life;
- f. develop and utilize written lesson plans;
- g. in grades K-3, use the benchmarks in reading and mathematics and the accompanying informal assessments to guide and measure student progress in mastering these basic skills;
- h. provide reteach and expanded learning opportunities based on student performance data;
- i. use effective instructional materials and technology resources correlated with content standards and objectives;
- j. consider using juried lesson plans/units, when available, based on the content standards and objectives;
- k. consider using the Informal Item Bank (See Sec. 5.38)
- l. enable students to solve problems and think critically;

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- m. provide challenging and rigorous instruction in all courses;
- n. continually monitor student progress and adjust instruction accordingly;
- o. understand the content standards and objectives of the curriculum that precedes and/or follows the grade(s) they are teaching
- p. integrate and reinforce the skills required in a career and the workplace, including the ability to: organize, plan, reason, and use information to solve problems; communicate orally and in writing; work effectively with others; understand and use technology; develop personal skills and attributes; and plan and prepare for a career; and
- q. provide co-curricular activities to expand and enrich the programs of study. Co-curricular activities may be provided during the instructional day without regard to the use of bank time. Examples of co-curricular activities include: band and choral presentations; theater productions; science or social studies fairs; mathematics field days; career/technical student organizations' activities; or other activities that provide in-depth exploration or understanding of the content standards and objectives appropriate for the students' grade levels.

7.3.2. Each teacher must use multiple strategies and methods to provide students the opportunity to master the content standards and objectives. Strategies that are effective and have been identified through research and/or practice include:

- a. encouraging parents/guardians to stimulate their children's intellectual development and academic achievement;
- b. grading, commenting upon and discussing homework assignments in a timely fashion;
- c. using direct teaching that includes systematic sequencing of lessons, a presentation of content and skills in small steps, feedback, guided practice with close teacher monitoring, reteaching as necessary, independent practice and homework, weekly and monthly reviews;
- d. guiding students to see relationships of past and present learning;
- e. tutoring of students by teachers, peers and qualified volunteers;
- f. increasing student participation through cooperative learning;
- g. employing a variety of instructional techniques and technology utilization to adapt lessons for the needs and interests of individual students and small groups;

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h. providing practice in effective work habits as part of instruction to assist students in realizing that it is their job to learn;

i. reviewing and reinforcing previously learned skills and, if necessary, reteaching skills before introducing new ones;

j. providing individual feedback to students on their work and progress;

k. providing reteaching and enrichment opportunities, including honors and advanced placement, for all students;

l. using instructional strategies, methods, and techniques that require the student to be actively engaged in the learning process;

m. linking classroom instruction to the student's future work and academic success;

n. using strategies that require students to apply academic knowledge in practical situations and problem solving;

o. using computers and other technologies, including the West Virginia Virtual School as appropriate, to provide learning opportunities in all subjects for students individually and in groups;

p. providing at some time in grade 9, 10, 11, or 12, structured opportunities for each student to participate in work-based activities, that are integrated with and an extension of the school-based programs of study;

q. integrating and interrelating academic and technical content throughout the curriculum;

r. providing a variety of opportunities for cross-disciplinary learning to emphasize the importance of writing in all programs of study;

s. planning and working together and exercising their professional judgement in the classrooms; and

t. providing enhancements to the traditional senior year by developing capstone projects, meaningful internships, and opportunities to take college-level courses; one-half of the senior year should be spent in higher-level academic courses, including mathematics or science.

7.3.3. Schools must implement a classroom management system that fosters an environment conducive to student success:

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- a. teachers create an atmosphere that is safe, secure, caring, and orderly;
- b. teachers and administrators set high positive expectations for themselves and for all students;
- c. teachers establish and communicate class rules and school rules;
- d. teachers engage students successfully in meaningful instructional activities;
- e. teachers are prepared and initiate instruction as soon as students arrive in the room;
- f. school administrators and teachers protect instructional time by allowing minimal interruptions of instruction and limiting out-of-class activities;
- g. teachers exhibit professional behavior, as defined in the Teacher Code of Conduct, show consideration and respect for individual differences, and guard confidentiality of student information; and,
- h. teachers teach, expect, and acknowledge responsible behavior including students being prepared for class and having appropriate materials (books, paper, and pencils) with them.

7.4. Personnel.

7.4.1. County boards shall employ supervisory/administrative staff who are professionally certified administrators who have met the requirements of training through the principals' academy as identified in W. Va. Code §18A-3-2c.

7.4.2. The principal's primary responsibility is instructional management and support within the school, including:

- a. developing flexible staff schedules to maximize opportunities to deliver instruction to groups of students or to individual students who may need additional assistance to master basic skills;
- b. scheduling time to work with staff, faculty senate, curriculum team and local school improvement council to plan, organize, implement, and evaluate the education programs;
- c. observing teacher and student performance in the class-room and providing feedback and recommendations for improvement;

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- d. analyzing and using performance data to improve student achievement;
 - e. monitoring activities during the instructional day and extracurricular and co-curricular time;
 - f. assisting teachers in developing individual plans for instructional improvement;
 - g. reviewing instructional plans on a regular basis with teachers;
 - h. coordinating professional development activities identified in cooperation with the building staff, faculty senate, curriculum team, technology team, and local school improvement council;
 - i. involving the community, including local school improvement council, business partner, parents, teachers, and other appropriate entities, in planning and reviewing the education program and providing leadership for the local school improvement council to develop and implement a Unified School Improvement Plan;
 - j. distributing time and resources on the basis of the Unified School Improvement Plan;
 - k. engaging educational and community leaders in a dialogue about the hopes, aspirations, vision, and future directions of local education;
 - l. keeping parents informed about the education program through newsletters, parent-citizen groups, and reports on student achievement;
 - m. encouraging meaningful parental involvement in student education;
 - n. establishing a school technology team and developing a technology plan;
- and
- o. coordinating jobs through education activities and other professional development activities as identified in cooperation with the county board of education, the county steering committee, and the building staff.

7.4.3. Principals shall be provided professional development opportunities through a variety of means such as the principals' academy, institutes, workshops, conferences, teacher and business exchange programs, and school site visitations.

7.4.4. County boards shall:

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- a. Employ professionally certified teachers to implement each program of study;
- b. Ensure that professional staff are working in the areas of endorsement specified on their certificates;
- c. Ensure that teachers have a general knowledge of the content standards and objectives for all levels of their program of studies (K-12) to promote program articulation.
- d. Ensure that professional staff are provided continuous professional development to increase their ability to deliver a high quality education program; and
- e. In Alternative Education Programs, as outlined in Policy 2418, provide for the participation of staff certified in the core subject areas in the development of the academic curriculum and the assessment measures to determine mastery of content standards and objectives.
- f. Ensure that teachers understand how to integrate technology into the learning process.
- g. Ensure that teachers implement their responsibilities within programs of study.
- h. Ensure flexibility in the scheduling of teachers, when appropriate, to maximize learning opportunities.
- i. Ensure that professional development opportunities are provided through a variety of means such as institutes, workshops, conferences, teacher and business exchange programs, and school site visitations.
- j. Ensure that teachers and library/media professionals are provided a duty free planning period that is the length of the usual class period and is not less than thirty minutes.

7.4.5. Support Staffing. County boards shall:

- a. Employ aides to enhance the instructional environment and provide time to ensure educational quality in the classroom;
 - A. Aides assist teachers with non-instructional duties and in instructional related activities in appropriate programs. Duties may include, but are not limited to: a) clerical and technical assistance; b) in-class assistance; c) tutorial services; d) distribution of instructional materials e) supervision of students in the instructional environment and

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during specific assigned duties (W. Va. Code §18A-5-8); f) assistance with technology utilization; and, g) in some cases, performance of basic or specialized health care procedures.

B. Kindergarten teachers have one aide if the class enrollment exceeds 10 students.

C. Aides are available for students with disabilities as needed to implement the Individualized Education Program and as set forth in the Regulations for the Education of Exceptional Students (Policy 2419).

D. Aides assigned to a school are scheduled by the principal.

b. Use community resources, when appropriate, in innovative ways on a volunteer, part-time, or contractual basis in order to complement, support, or extend the instructional program including the provision of work-based learning opportunities.

7.4.6. Personnel Development. County boards shall:

a. Implement an evaluation system based on Policies 5300, 5310, and 5314

b. Implement a comprehensive system of staff development that includes the implementation of Policy 5500 and the Jobs Through Education Act (S.B. 300, 1996 RS) as an integral part.

7.5. Facilities.

7.5.1 County boards shall ensure that facilities meet the standards set forth in Policy 6200.

7.6. Instructional Materials, Supplies, and Equipment. County boards shall:

7.6.1. Ensure that the instructional materials used as the primary resource for instruction in required programs of study are on the most recent list of state adopted instructional materials or have been exempted by the West Virginia Board of Education through an approved waiver or through the WV Virtual School course approval process.

7.6.2. Establish procedures to select instructional materials and supplemental resources that correlate with the content standards and objectives for each program of study.

7.6.3. Ensure that appropriate instructional materials and equipment are available for the full instructional term, in good operating condition, and are sufficient for the size of the group to be served.

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7.6.4. Ensure that a copy of the appropriate content standards and objectives is provided each teacher and ensure that the public has been provided information about and access to materials for review upon request.

7.6.5. To the extent practicable, and as funds and other resources are available, provide access to instructional technologies outside the normal school day for use by students (including those in adult education), teachers, parents and citizens.

§126-42-8. Program Accountability.

8.1. The county board of education shall establish policies and implement written procedures for assuring the public, the West Virginia Board of Education, and the Legislature that a thorough and efficient system of education is being delivered to all students. Those policies and procedures shall address the assessment of students and the use of data to provide assistance to students and the use of student assessment data to develop Unified County and School Improvement Plans that will improve the education program for individual students, individual schools, and specific programs of study. In meeting the requirements of this regulation, the county board shall address the following components:

8.2. Student Assessment and Assistance.

8.2.1. The county board of education shall ensure that a school assessment program is in place that produces data that are used to improve instruction of students. The assessment program shall consist of both standardized and non-standardized forms of assessment. All students in the school, including those with disabilities, must participate in the state assessment program as defined in Policy 2340. An Individualized Education Program (IEP) or a Section 504 Plan specifies how a student with disabilities will participate in the statewide assessment program. Assessments given in grades K-2 will not be used as a basis for accreditation or other high stakes purposes. Selected schools will participate in the National Assessment of Education Progress (NAEP) testing program. The school assessment program includes non-standard assessment processes and procedures such as portfolios, observation data, performance and achievement checklists, teacher-made tests, and other assessments that are at the direction of and for use by the classroom teacher.

8.2.2. Each county, school, and teacher has a system for analyzing, interpreting, and using student performance data prior to the beginning of the school year. The data are to be used to identify and assist students who are not at mastery level in their achievement of state and county board approved content standards and objectives.

8.2.3. A diploma is provided to every student who has completed the standard graduation requirements. A student with disabilities who has been determined by an Individualized Education Program (IEP) Team to be unable to meet state and county

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standard graduation requirements may receive a modified diploma. (See Section 5.25) and Policy 2419)

8.2.4. A Certificate of Proficiency containing specific information regarding the graduate's skills, competence, and readiness for employment and further education, is provided to every high school graduate. The following information is to be recorded on the certificate of proficiency given to every graduate:

- a. Test results from any part of the statewide assessment program in which the student participated;
- b. High school courses taken (in grades 7-12) with grades and credits received;
- c. Computer instruction received;
- d. GPA (grade point average) for all high school courses completed, regardless of the grade level when completed;
- e. Class rank out of total graduating class;
- f. Attendance per year for grades 9-12;
- g. Co-curricular and extracurricular activities;
- h. Grade scale including letter/numerical equivalent, use of weighted grades;
- i. Special competencies;
- j. Technical training and credentials acquired;
- k. Successful completion of a career major;
- l. Formal work-based learning experiences completed; and,
- m. College credits earned.

8.2.5. Any student performing below the 50th percentile in the areas of reading or mathematics or language at grade eight or above is placed in a skill improvement program. Parents must be advised that their child will be placed in the program and they must be involved in the placement conference. If the program is delivered as a class, the class may not be substituted for a course required for graduation but may be used for elective credit.

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8.2.6. An Individualized Student Transition Plan covering grades nine through twelve and the first year beyond graduation from high school is developed for every student in consultation with her/his parents and school counselor or advisor.

a. Plan Development and Initial Implementation

A. During the eighth grade year, each student's plan is developed for grades nine and ten. The plan is based upon previous career awareness, exploration activities, and a review of the student's ACT Explore results.

B. Each student, in consultation with his or her parents and school counselor or advisor, selects a broad career cluster for exploration in grades nine and ten and develops the plan based upon the choice of a career cluster. The student may amend his/her plan at the end of any semester.

C. The parent(s) and student each sign and receive a copy of the plan.

D. The plan for an eligible gifted student is developed during the eighth grade year by an IEP Team and includes the honors and advanced placement classes that must be provided for the student in grades nine through twelve.

b. Selection and Implementation of Career Majors.

A. During the tenth grade year, each student shall develop, after review of the student's ACT Plan results, and in consultation with her or his parent(s) and school counselor or advisor, the second phase of the plan and shall select a career major for the final years of high school and the first year after high school that will prepare the student for college, other post-secondary education, and gainful employment. The plan may be amended and/or the career major changed at the end of any semester.

B. The following rules allow students, whether they are preparing for college, other postsecondary education, or work, to take a higher level or more rigorous course, The College Board's Advanced Placement course, or a college course in place of a required career major course or recommended elective course as set forth in the applicable high school programs of study document, as evidenced by parental and school signatures on the student's five-year transition plan. These rules do not apply to the required academic units for English Language Arts, Mathematics, Science, Social Studies, Physical Education, Health and the Arts specified in Charts IVA and IVB of this policy as the minimum state requirements for graduation.

(a) A student, in consultation with his or her parents, may request to take a higher level or more rigorous course, The College Board's Advanced Placement course, or college course in lieu of a required career major or recommended elective course as specified in the high school programs of studies document. Such requests should be approved by the county superintendent (or designee) and principal. The

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decision as to whether the substitute course will count as credit for the specified major or recommended elective requirement must be based on its applicability to the student's 5-year transition plan and post high school goals.

(b) The student and his or her parents must be advised of the decision of the superintendent (or designee) and the impact of the substitute course on the student's preparation for college, other postsecondary education or employment in the student's major field of study. Furthermore, the student's Certificate of Proficiency must not indicate that the student completed a career major unless the course is judged to be related and relevant to the career major.

(c) A notation must be made on the student's five-year transition plan indicating that this process was followed and that the parents and student clearly understand the impact of the course substitution.

(d) Definitions of terms used in this section are as follows:

(A) Higher Level Course - A course in the same content area, but at a higher sequential level "(e.g., Trigonometry in lieu of Geometry)."

(B) More Rigorous Course - A course within the same content area in which the rigor and expectations are higher than the course for which the substitution is being made (e.g., Advanced Chemistry in lieu of Chemistry-Technical Conceptual).

(C) Advanced Placement - An academic learning experience characterized by content and performance expectations beyond those normally available for the age/grade level of the student (e.g., The College Board; Advanced Placement course, or advanced satellite or Internet courses).

(D) College Course - Any course for which college credit is awarded (e.g., dual credit, regular college course).

C. The parent(s) and student each sign and receive a copy of the plan.

(a) Other Plan Components May Include

(A) Co-curricular Activities

(B) Extracurricular activities

(b) Assessment of Plan - Each graduate will be provided an assessment form, and will be requested to complete and return the form at the end of the first year following graduation to the high school from which she/he graduated. (Effective July 1, 2003)

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D. Students choosing the professional pathway, along with their parent(s), may use the process set forth in this section to substitute other career major courses for the fourth credit in mathematics and/or the fourth credit in science and/or the two credits in a foreign language if the credit(s) to be substituted is/are more likely to prepare the student for success in college and/or are more relevant to the student's post-secondary goals as identified in the five-year transition plan. The student and his/her parents, when choosing to substitute other courses must sign a form stating that they understand that in so choosing the student will not meet admission requirements for a baccalaureate degree program at any West Virginia public college or university.

E. Students choosing the skilled pathway, along with their parent(s), may use the process set forth in this section to substitute another career major course for the fourth credit in mathematics if the credit to be substituted is more likely to prepare the student for success in post-secondary education and/or is more relevant to the student's post-secondary goals as identified in the five year transition plan.

F. Superintendent or their designees and principals may not use this process to grant blanket approvals for substitution of other career major courses for the required fourth credit in mathematics, and/or the fourth credit in science, and/or the two credits in a foreign language.

8.3. Program Improvement.

8.3.1. Each county shall establish a Unified County Improvement Plan that must contain at least the following:

a. How the county school system intends to strengthen the county education program in order to increase student achievement.

b. 1) Performance assessment and an agreed upon vision/mission/goals statement(s), 2) designated improvement objectives and activities, 3) available funds, 4) resources available to the county board, 5) a system for monitoring the implementation and effectiveness of activities, 6) an evaluation process, and 7) a budget.

c. Procedures for gathering and processing specific performance data regarding student achievement, attendance and dropout.

d. Procedures for reviewing the programs of study on a regular basis to determine the need for program improvement. That review must include information about student achievement within the program(s) of study and information about the performance of students who have graduated.

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e. Procedures for evaluating the methods, techniques, technology and materials used to deliver the programs of study.

f. A mechanism to ensure that staff development and informational services are available for teachers and others who are responsible for developing and delivering the programs of study.

8.4. School Improvement.

8.4.1. Every school must have a Unified School Improvement Plan designed to improve the academic achievement of the students in the school that adheres to the following criteria:

a. Prepared by the local school improvement council (LSIC) under the leadership of the school principal and in cooperation with the faculty senate, school technology team and school curriculum team.

b. Based upon: 1) performance assessment and an agreed upon vision/mission/goals statement(s), 2) designated improvement objectives and activities, 3) available funds, 4) all resources available to the school, 5) a system for monitoring the implementation and effectiveness of activities, 6) an evaluation process, and 7) a budget.

c. Predicated on the establishment of high expectations for performance of all students in the school.

d. Presented to the county board of education as part of the annual meeting between the LSIC and the county board of education.

8.4.2. Schools will be selected to receive technical assistance based upon their status with regard to the performance measures and high quality standards set forth in State Board Policy 2320 (126CSR13). The Department of Education will operate a school improvement program the purpose of which is to provide assistance to Seriously Impaired and other low-performing schools. The school improvement process will be designed not only to assist already low-performing schools but to provide a system for building capacity in schools prior to the time they become Seriously Impaired.

8.5. Education Information System.

8.5.1. Every county and school shall participate in the West Virginia Education Information System (WVEIS).

§126-42-9. Alternative Delivery Systems.

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9.1. The county board of education shall establish policies and implement written procedures when providing for alternative delivery of education and service programs for students and community members. In addition, these policies and procedures should address community linkages and partnerships to foster student achievement.

9.2. Administrative Practices.

9.2.1. Ensure that a thorough and efficient education is available to all students in either a regular or alternative program.

9.2.2. Provide a rigorous and relevant curriculum based on academic requirements.

9.3. Program Delivery.

9.3.1. Extended Student Learning - Extended student learning may be offered based on student needs and as funds and other resources become available.

a. Extended student learning may include but is not limited to: extended day or year; mini-courses; summer school or an alternative calendar that allows for year-round schooling; and work-based learning that may take place outside of the regular school calendar. (See, e.g., Policy 3234 that provides for year-round schooling).

b. Extended student learning may be provided by the school system, community agencies, institutions of higher education, businesses or other entities under agreements authorized by the county board or West Virginia Board of Education. These agreements may include payment specifications for those parties using the facilities.

c. Students may elect to participate in extended learning opportunities and may receive elective credit when approved by the county board or West Virginia Board of Education.

9.3.2. Summer School - All summer school programs shall be submitted to the West Virginia Board of Education for approval. Schools may award credits earned from approved summer schools provided the instructional program is equivalent to that required in the regular school term.

9.3.3. Community Education.

a. County Boards of Education should maximize opportunities to provide adult basic education or adult enrichment opportunities; and

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b. Opportunities to provide continuing education and staff development for local businesses should be maximized. This includes training on appropriate placement and supervision of students receiving work-based learning experiences.

9.3.4. Home/Hospital Instruction.

a. Students who, due to injury or for any other reason as certified by a licensed physician, are homebound for a period of two weeks or more shall receive home/hospital instruction.

A. Eligibility Criteria - Documentation that a student meets one of the following criteria:

(a) Has an injury, communicable illness, or health condition that prevents her or him from attending school for a time that will interfere with the student's ability to master necessary skills and that is diagnosed and confirmed by a licensed physician; or

(b) Has an injury or health problem/condition as diagnosed and confirmed by a licensed physician that requires her or him to be homebound or hospitalized for a period that has lasted or will last more than two weeks.

b. Special Considerations for Eligibility

A. A licensed physician must provide a written statement to the county school district that the student must remain at home or in the hospital for a period of two weeks or more. The written statement must include:

(a) The specific reasons why the student must remain at home or in the hospital; and

(b) The criteria or conditions under which the student can return to school, and the expected date of such return.

B. Students placed on extended home instruction shall submit a physician's statement of need for continued home instruction when the term of home instruction reaches six months in length.

C. The county board may require that the parents obtain a second physician's opinion at the expense of the county board.

c. Instruction

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A. Home/hospital instruction, provided for those regular education students who are unable to attend school for a period of time, is an extension of the regular school programs of study.

B. Home/hospital instruction, provided for an exceptional student who is unable to attend school temporarily because of an injury, illness, or health condition, is an extension of the Individualized Education Program (IEP) and the regular school programs of study in which that student participated.

C. Home/hospital teachers are responsible for providing instruction on content standards and objectives determined by the student's classroom teacher(s) and therefore, must be in regular contact with the classroom teacher(s).

d. Schedule

A. Home/hospital instruction may be provided at any time. Instruction is to start as soon as possible following determination of the students eligibility for instruction.

B. The instructional schedule per week must be based upon the student's physical ability to attend/participate as specified by the physician who confirmed/diagnosed the injury or health problem/condition.

C. The time that instruction will be provided in the home is established by the teacher, the parent(s), and when appropriate, county school district administrator.

D. Home instruction is provided at a time when a responsible adult is in the home.

E. The student's school shall provide the home instruction teacher the opportunity to meet with the student's teacher(s) and shall provide the county adopted instructional materials, teacher's editions, materials, equipment and supplies the student requires to complete the student's programs of study.

F. The student's teacher(s) shall provide the home instruction teacher with copies of daily lesson plans, including homework assignments, when requested.

9.3.5. Alternative Settings for Disruptive Students.

a. Students whose disruptive behavior places them at risk of not succeeding in the traditional school structure may be eligible for placement in an alternative education program as authorized by Policy 2418.

9.3.6. Schools as Service Centers.

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a. School facilities should be made available for service delivery to community members. These services may include, but are not limited to, school-based health centers, and day care centers.

b. Service centers may be operated by the school system or the services may be provided by external agencies such as a primary care center or the Department of Health and Human Resources.

9.3.7. Teacher Assignments.

a. In order to effectively provide for optional delivery systems, consideration should be given to flexible scheduling of educational personnel within the daily and/or yearly schedule.

9.4. Accountability.

9.4.1. All programs for elementary and secondary schools must meet the standards and safeguards set forth in West Virginia Board of Education policies related to curriculum, instruction, and student support services.

9.4.2. Letters of agreement and/or contracts shall be used with external agencies, businesses, and individuals to clarify responsibilities in areas such as: student supervision, public access to school facilities, finance, and program accountability.

FISCAL NOTE WORKSHEET
(Submit 4 Copies)

DRAFT NO _____ BILL NO _____ RESOLUTION NO _____

SUBJECT Policy 2510: Assuring the Quality of Education: Regulations for Education Programs FUND General

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

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

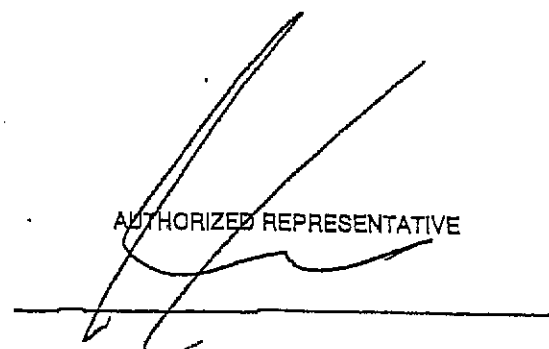
DATE

AGENCY

AUTHORIZED REPRESENTATIVE

April 22, 2002

West Virginia Department of Education



POLICY 2510: ASSURING THE QUALITY OF EDUCATION: REGULATIONS FOR EDUCATION PROGRAMS
 COMMENT LOG
 2002

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

TYPE
 -Negative
 +Positive
 0 Negative

DATE	INDIVIDUAL/ ORGANIZATION	COMMENTS	ACTION/TYPE	RATIONALE
3/3/02	Ralph I. Cunningham, Calhoun County School Board	I would like to take the opportunity to address the section 6.7.3 portion of Policy 2510 proposed changes. Please note, I serve as School Board Member in Calhoun County and while I can support many of the changes in the revised Policy I have to question of the total exclusion of Extra Curricular Activities during the regular School day. The Schools in Calhoun are required to keep to a minimum the number of Events to occur during the regular school day. Occasionally it is necessary to leave a little early to arrive on time for scheduled events and once in a very small while there is an event scheduled for the Student Body. So understand we do keep it to a minimum. In the course of Scheduling these events and given the long travel time from school to school in some cases some Schools would be limited to few opponents within a reasonable travel time. In our situation We have no Lights for our Baseball or Softball Fields an early on in the Season we could not complete Games before dark. Also would Teams participating in State Tournaments be held to the same restrictions? As with the recent State Wrestling Tourney it would be necessary to Wrestle Saturday and Sunday then travel Home and return the following week end to complete the Tourney, does that make sense? It has been stated in some of the Annual School Board training that the Extra-Curricular Activities offered in our Schools are the single most effective Drop out prevention Tool available to the Children in Schools to day. One of the biggest reasons is that these Children are required to maintain a C average in their class work. They know they have to work harder than the regular Student body to keep their Grades up. To limit these programs may only add to the problem of keeping as many Children as possible in the Programs. There needs to be some leeway in the Policy for these matters not just a Black and White solution. As I have found, in making local Board Policy, the only bad policy is the one you are not willing to make adjustments to once you find a flaw and it is much easier to correct a problem before it becomes one.		
4/28/02	Stanley E. Shaver, Principal, Fellowsville Elementary School, House of Delegates	I have a proposed addition to POLICY 2510 that I think should be included under 7.4 Personnel. ¶ 7.4.3 Deals directly with Principals. It reads as follows: 7.4.3 "Principals shall be provided professional development opportunities through a variety of means such as the principals' academy, institutes, workshops, conferences, teacher and business exchange programs, and school site visitations." I would like to see added to this list the following so the paragraph would read: ¶ 7.4.3 Principals shall be provided professional development opportunities through a variety of means such as the principals' academy, institutes, workshops, conferences, being a member of the state legislature (if elected or appointed) , teacher and business exchange programs, and		

DATE	INDIVIDUAL/ ORGANIZATION	COMMENTS	ACTION/TYPE	RATIONALE
5/3/02	Stanley E. Shaver, cont'd. William A. Smith, Asst. Superintendent, Cabell Co. Schools	<p>school site visitations. ¶ As a member of the current House of Delegates Education Committee I know of no other institute, workshop, conference, etc. that can give a principal the knowledge and insight of the "Big Picture" of Education that the legislature can. I am inclined to think that you would agree with this since we have worked together. This is a statement of vision for the future and should be considered.</p> <p>The 75% per school attendance requirement would trigger a makeup day in the calendar. The logistical difficulties of having part of the system open while the others are off would be an undue burden on the school system. Bus drivers, cooks, maintenance staff, and professional faculty, etc. would view this as "inequitable" making it difficult to staff the affected school or schools on the makeup day.</p> <p>I understand the intent is to encourage districts to carefully consider the placement of faculty senate days as well as attendance rates; however, that incentive is already in place in policy 2320.</p>		
5/8/02	Dr. Nancy C. Kilmon, Director, Research and Technology, Berkeley County Schools	<p>§126-42-6 Program Definition – 1. On page 27, the Chart IV(B) cites 16 credits after the words Core Requirements. Should that be 17 credits? 2. I would like to be sure that we understand the effective date of the changes in graduation requirements. The first group that must have civics is the Class of 2009, correct? 3. To further clarify the changes wrought by Chart IV(B), the number of electives is reduced by one and the number of core requirements is increased by one, that is, the addition of <u>civics</u> as a required credit. Correct?</p> <p>§126-42-7 Program Delivery – Among the "Major Changes" list in the Executive Summary, #17 refers to section 7.2.10.V, which is not there. Is a section missing or is the reference incorrect?</p> <p>§126-42-8 Program Accountability – 8.2.6.b.C(b) Assessment of Plan 1. This section specifies an effective date of July 1, 2003. Clarification is requested. Is the initial assessment form completed by Graduates of the Class of 2003 at the end of their first year as graduates (Spring 2004)? Or, do the graduates of the Class of 2004 during Spring 2005 complete the first assessment form? 2. This same section specifies that the graduate would complete the assessment form at the "end of the first year following graduation." a. The WV Higher Education Policy Commission requests follow-up data on our graduates by the end of March of their first year after having been graduated. Will the Higher Education request remain separate from the assessment specified in this section? In other words, would there be two follow-up efforts involving each class of graduates or will they be combined? b. If the assessment form is to meet Higher Education's needs as well as certain legislative concerns, does the completion data in this section have to be reconciled with that required by Higher Education? c. Will WVDE design and provide the assessment forms? d. Will the information from the assessment form be reported to WVDE in any form?</p> <p>§126-42-9 Alternate Delivery Systems – We note that the fiscal note page that accompanied the version we reviewed had no costs attributed to the changes. Certainly the addition of civics as a core requirement will have an impact on personnel. Has this additional cost been noted somewhere?</p>		

DATE	INDIVIDUAL/ ORGANIZATION	COMMENTS	ACTION/TYPE	RATIONALE
5/9/02	Linda L. Adkins, Social Studies, Barboursville Middle School	<p>I am a teacher at Barboursville Middle School in Cabell County. My name is Linda L. Adkins. I started my 37th year on 2-02-02. The proposed 75% rule is the most ridiculous idea that has come from the state in my entire career. 1. You are aware that this will punish those students who were in school by making them go extra days-beyond the 180 required by state law? How do you think parents will react to this? 2.OSE days were given several years ago instead of a pay raise. Then we began trading OSE days to make up bad weather days. Okay, that was an unplanned day off for a planned day off. NOW you really believe that teachers, bus drivers, cooks, custodians and supervisory personnel will work an additional day-working 2 days, the day that less than 75% of the students were present and the scheduled OSE day. I think not! OR is it planned that those students and staff in a school with less than 75% in attendance will go home on that day in order to keep within the 180 day school year? 3. How does this relate to the legislature passing the new attendance rule? My understanding is that students with severe attendance problems are no longer to be counted against the county/school ADA. Does this not make the proposed ruling about 75% go against state law? 4. How will this handle -epidemics(flu for example)when a county board of health orders the closing of a school--floods, or does the wvde have a guarantee tht no more floods will occur-- heavy snowfall, that force school systems to close for several days, or is that no longer to happen in WV.</p> <p>I have surveyed my 7th grade students- they all respond when I explain this to them that this is a PUNISHMENT and several a suggested that their parents(lawyers) will fight this if adopted.</p>		
5/10/02	Robert Eggleton, Director of Administration, WV Division of Culture and History	<p>Title 126, Legislative Rule, Board of Education, Series 42, Assuring the Quality of Education: Regulations for Education Programs (2510) §126-42-1.</p> <p>7.3.1.q "...Examples of co-curricular activities include: band and choral presentations; theater productions; science or social studies fairs; mathematics field days; career /technical student organizations' activities; tours of historic sites or museums;...."</p> <p>Rationale: Clarification of the policy is needed to ensure that students continue to benefit from educational programming delivered by the Division of Culture and History, including guided tours of the State Capitol and the State Museum. The Division would prefer that it be specifically mentioned in the policy as follows, but the above clarification would likely provide sufficient discretion to county boards.</p> <p>7.3.1.q "...Examples of co-curricular activities include: band and choral presentations; theater productions; science or social studies fairs; mathematics field days; career / technical student organizations' activities; tours of historic sites or museums or educational programs delivered by the Division of Culture and History;...."</p> <p>Thank you for your consideration.</p>		

DATE	INDIVIDUAL/ ORGANIZATION	COMMENTS	ACTION/TYPE	RATIONALE
5/16/02	Warren Lee Grace, Jr., Principal, Paden City High School	<p>Policy 2510, as you well know, is out for public comment until May 25, 2002. There are several provisions that I take exception to and I would like to officially object to the following provisions of Policy 2510: ¶ 5.39 as defined by Policy 4110 that the percentage of students that must be in attendance in order for a day to be considered an "instructional day" has been specified at 75%. The question was whether that would be by school or county. The State Department has stated it is by school. ¶ Comment: Secondary schools in West Virginia are being pulled and pushed in very different directions simultaneously. How are we supposed to address workplace learning activities without having substantial numbers of students out of the building? There are many other very worthwhile activities that will be eliminated by this portion of the policy. There have been events that have forced individual schools to send students home for the day. What happens to a school that has one or more instructional days less than the rest of the county schools system? It seems to me that the persons proposing these policy changes are very disconnected from secondary school instruction in West Virginia. ¶ On Chart III of the middle school program of study, Foreign Language is added at the middle school level. Is nobody aware of the fact that there is a SEVERE SHORTAGE OF FOREIGN LANGUAGE TEACHERS???? (Note: Can anybody explain why the West Virginia Board of Education and the West Virginia Department of Education are ADDING curricular requirements at the time of declining enrollment and REDUCTION OF SCHOOL TEACHING PERSONNEL????) ¶ PLEASE do NOT approve Policy 2510, or 4373, Student Code of Conduct, or Policy 4110, State Attendance Policy, until Building Level Principals and Assistant Principals and teachers can have a reasonable amount of time to register the MANY, MANY objections to all three of these policies.</p> <p>The stipulation that 75% of students must be present on a given day to have the day counted as an instructional process must have a waiver process in place to deal with individual school closures. ¶ A case in point would be the closure of Mountain View School due to heat, water, or sewage...with 720 students in that population, Monroe County would only have 65% attendance on that day. To require the other schools to make up a day they actually attended would mean that we should close the county down when there is a problem in one school...</p> <p>The proposed changes in Sect.5.39 and 7.2.12 of Policy 2510 are not equitable. Because I teach in a school where flood waters often loom nearby, I can easily visualize the day where the faculty and staff have arrived to work but high water has kept the buses from running and the children at home. This year there were several days where attendance was below 75%, but we were here ready to teach and taught to those present. I think that your "legal leg" regarding this proposed change would be a bit wobbly. If staff shows up, staff should be paid. If the staff has reported for the correct number of contractual days, no more can be legally added by policy alone. ¶ Please keep these issues in mind when considering this change.</p> <p>I don't think the staff of a school should be penalized because of a student or parent's responsibility re: school attendance, especially on the Faculty Senate days. The Legislature made the change to 1/2 day and knew there would be a problem with this as it was several years ago when Faculty Senate days were half-days.</p>		
5/16/02	Dr. Lyn Guy, Superintendent, Monroe County Schools			
5/16/02	Marilyn Murdock, Cabell County			
5/17/02	Jean Biggs, Central City Elementary, Cabell County			

DATE	INDIVIDUAL/ ORGANIZATION	COMMENTS	ACTION/TYPE	RATIONALE
5/17/02	Donna Griffith	<p>I am not in favor of this policy (2510) that will require 75% attendance to be an instructional day. Our school (Central City Elementary, Huntington) works very hard to keep attendance up to an acceptable level. We have made strides in the four years that our school has been open, but we still have problems with no parent transportation if children miss the bus, no child care for half-days, and parents that still have no real value of education to realize that attendance IS important! I predict that we are going to have a problem on these new faculty senate release days. I do not think that we should be punished for situations that are not in our control. I also feel that the children who do attend are being treated unfairly if their school attendance does not count on a "less than 75%" day. I hope that the policy makers will take some time to really think about what this requirement means to most schools in WV.</p>		
5/17/02	Daniel D. Curry, Superintendent, Wood County Schools	<p>I'll make one final suggestion for 2510. If we must teach civics to all, I believe we should save it for the senior year and shape it to more practical uses. We recently completed a survey of Wood County Graduates from the last four years who attend WVU. We found that most felt prepared academically, but they struggled with managing their time, study skills and managing their money. ¶ There are two things that 99% of our graduates will be - parents and citizens. I think the civics class should be designed as a citizenship class. We as educators complain about the impact of poor parenting all the time, yet formal instruction of it takes place only for those who choose it as an elective course. The college educated do not automatically become good parents. The class should have a unit on civics, but also should address parenting and personal finances. I think it some units could vary for professional, technical and skilled students. I believe our teachers can do some things to help our college bound students improve their study skills, but the time management and money management issues could be part of the citizenship class. ¶ I'm sure you can't wait to finish up 2510. We're ready as well.</p>		
5/20/02	Margaret Miller, Curriculum Specialist for Social Studies, Kanawha County Schools	<p>Mr. Luff and Members of the West Virginia Board of Education, I am commenting on the new graduation requirement for one credit of Civics. Kanawha County has been requiring one half credit of civics and one half credit of economics for the past two years. This has been a very effective and powerful requirement for students. Recent studies published in the newspaper have indicated that American students know very little in each of these areas and we would like to continue our program with some revisions to our objectives. These revisions may include more expectations for participation in civics and a stronger emphasis on financial literacy in economics. We ask that you consider requiring one half credit of Civics and one half credit of Economics for high school graduation.</p>		
5/20/02	Steve Tennant	<p>I am concerned with the current statements in Policy 2510 concerning adding more required classes for graduation. I truly believe that additional time should be spent on teaching civic and government, but that should be within the current CSO's for eight or ninth grade social studies, not an additional class to be required for graduation. The other concern I have is the potential requirement of two foreign languages for any student in the professional level. I am a college graduate with a masters degree in Agricultural Economics and have yet to take a foreign language class. I do not feel my inability to speak a foreign language has or will ever prevent me from being employed.</p>		

DATE	INDIVIDUAL/ ORGANIZATION	COMMENTS	ACTION/TYPE	RATIONALE
	Steve Tennant, Cont'd	<p>High school students should be able to gain a well rounded education without the restrictions of Clusters and Majors and especially without being forced to take classes in foreign languages.</p> <p>I strongly encourage you and the State Board of Education to rethink the changes to current policy.</p>		
5/21/02	Special Education Teacher, Sutton Elementary School, Sutton, WV	<p>126-42-5. Glossary – It is impossible to hold teachers responsible for student attendance. At our school we do everything to encourage good attendance. It is unfair to hold us and the students who do have faithful attendance. Why not try a policy that includes holding parents accountable for student absences.</p>		
5/21/02	Blaine Hess, Director of High Schools and Vocational Education, Jackson County Schools	<p>5.39.1.1 The requirement that 75% of a school student's to be present in order for the day to be counted as an instruction day initially sounds like a reasonable requirement. However, upon further examination, it appears that this requirement could increase transportation costs without improving attendance. ¶ The proposed policy states that the 75% attendance rate will be calculated on a school-by-school basis. In the event that only a few schools in the county did not meet the attendance rate on a given day, buses may be needed throughout the county for the make-up day. It is also very likely, particularly on the secondary level, that students that attend school on a day with less than 75% attendance might be reluctant to attend the make-day, with might cause yet another day of less than 75% attendance.</p> <p>6.4.13.1 As graduation requirements are increased, the opportunity for students to enroll in elective programs will decrease proportionally. The ability to enroll in elective courses will be impacted further if a student must repeat a given course during his/her high school education. ¶ The latest addition to the requirements for graduation is a Civics course. This course, while a worthy subject, would be better suited as an elective course. The addition of another required course will necessitate additional staff or fewer elective offerings.</p> <p>Fiscal Note: It is noted within the revisions of Policy 2510 that the changes will not require any additional cost in order to implement. It is difficult to imagine that increased graduation requirements relating to mathematics, science, foreign language and civics will not require additional staff, which in turn will cost more money.</p>		
5/21/02	Cheryl Whitescarver, Counselor, Grafton High School	<p>I am a school counselor with more than 20 years in the profession and I am hoping that the new provision to require all professional pathway students to take foreign language is reconsidered. By doing this, we as a state are setting more stringent requirements than the colleges themselves as most medical, engineering, business, etc. degrees do not require foreign language. Our Programs of Study book which we developed at some length already addresses this issue and makes clear to students when foreign language is required. We also advise any student that wishes to keep all options open to take foreign language and all students are told to check out general admission requirements as well as program requirements at the school of choice. Why backtrack to a one size fits all program for our professional pathway students? This is further limiting student options and though well intentioned, cannot be considered progress.</p>		

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5/21/02	James Beatty	<p>Policy 2510 will add additional requirements to our students that they may not necessarily need. I feel the bill should encourage students to take foreign languages not require them. The same should be said for civics, should students really have to take 4 years of history or social studies? I feel that you will have more success with students if you strongly suggest they take foreign languages instead of making them mandatory. Mandatory foreign language will increase the number of students who do not graduate for lacking the requirements. Students who are in a technical area and do not plan on going to college should not have additional academic requirements that keep them from the classes which teach them the skills necessary to succeed in these chosen careers. So please do not add any more requirements to the students coming into high school and let them choose their pathway with the current class load requirements.</p> <p>I would like to comment on proposed provisions of Policy 2510:</p> <p>a. Given the shortages of competent teachers to offer foreign languages, the limitation of choices of foreign languages offered, and the limitation of county systems to employ and fund additional teachers, I would strongly encourage the Board to consider continuing the two credits of foreign language as a recommendation rather than a requirement for students in the professional career pathway.</p> <p>b. It would seem prudent to infuse the study of civics into the existing required social studies courses. I believe some degree of freedom for students to select and take elective courses is essential for maintaining interest in school work through the high school years.</p> <p>c. In the same light, I strongly encourage the modification of the current fine art requirement to be worded as a fine or applied art.</p> <p>I would like to comment on proposed provisions of Policy 2510.</p> <ol style="list-style-type: none"> 1. I would strongly encourage the Board to consider continuing the two credits of foreign language as a recommendation rather than a requirement for students in the professional career pathway. 2. I urge the Board to explore ways the civics component can be infused into existing social studies requirements. If that is not possible, I encourage the Board to consider recommending rather than requiring the completion of a civics class as a requirement for graduation. <p>A recommendation provides guidance for all students. Most students, especially those preparing for a college education, will follow through with the recommendation(s). Students must be given some degree of freedom to select classes in order to maintain interest in school and their academic pursuits.</p>		
5/21/02	Layle D. Lawrence, Professor and Chair, Agricultural and Environmental Education, WVU	<p>I would like to comment on proposed provisions of Policy 2510:</p> <p>a. Given the shortages of competent teachers to offer foreign languages, the limitation of choices of foreign languages offered, and the limitation of county systems to employ and fund additional teachers, I would strongly encourage the Board to consider continuing the two credits of foreign language as a recommendation rather than a requirement for students in the professional career pathway.</p> <p>b. It would seem prudent to infuse the study of civics into the existing required social studies courses. I believe some degree of freedom for students to select and take elective courses is essential for maintaining interest in school work through the high school years.</p> <p>c. In the same light, I strongly encourage the modification of the current fine art requirement to be worded as a fine or applied art.</p> <p>I would like to comment on proposed provisions of Policy 2510.</p> <ol style="list-style-type: none"> 1. I would strongly encourage the Board to consider continuing the two credits of foreign language as a recommendation rather than a requirement for students in the professional career pathway. 2. I urge the Board to explore ways the civics component can be infused into existing social studies requirements. If that is not possible, I encourage the Board to consider recommending rather than requiring the completion of a civics class as a requirement for graduation. <p>A recommendation provides guidance for all students. Most students, especially those preparing for a college education, will follow through with the recommendation(s). Students must be given some degree of freedom to select classes in order to maintain interest in school and their academic pursuits.</p>		
5/21/02	Harry N. Boone, Jr., Agricultural and Environmental Education, WVU	<p>I would like to comment on proposed provisions of Policy 2510.</p> <ol style="list-style-type: none"> 1. I would strongly encourage the Board to consider continuing the two credits of foreign language as a recommendation rather than a requirement for students in the professional career pathway. 2. I urge the Board to explore ways the civics component can be infused into existing social studies requirements. If that is not possible, I encourage the Board to consider recommending rather than requiring the completion of a civics class as a requirement for graduation. <p>A recommendation provides guidance for all students. Most students, especially those preparing for a college education, will follow through with the recommendation(s). Students must be given some degree of freedom to select classes in order to maintain interest in school and their academic pursuits.</p>		

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5/21/02	Carol Boersema	<p>I e-mailed you back in February about the 2510 policy. The way I read it then was field trips, extra curricular activities in the classrooms (such as crafts) would be eliminated during the school day. I'll have to admit I was not at all pleased and I wrote an unpleasant message criticizing the new rules. Your response was immediate and informative but still found it frustrating to know hardly anyone knew about the changes or the website. By the time I spread it through the school, it was too late to have a say in the matter. I see now it is extended till May 25. I will inform others about these revisions but the way I see it now, we can have field trips and other activities during the school day (Sec 7.2.14.c and 7.2.14.q). Is this using Bank Time only or may some instructional time be used for these subject-related crafts?</p> <p>I am very pleased you have extended the deadline for comments to May 25. Thanks for your concern.</p> <p>The essence of what the policy is doing is great.</p> <p>The pace and volume of change with this and other policies impairs comfort to an unhealthy degree. Change requires us to get out of our comfort zone, but this may be uncomfortable to an unhealthy and damaging degree. Efforts at reassurance and gradulization may be crucial.</p> <p>The community makes independent decisions about what days count and which days do not. On a few days, like state hoop tournaments, the community value system imposes less than 75% attendance. What if we show up and less than 75% of the pupils do? How will we make this up if our people meet their contractual obligations?</p> <p>Will we be able to grade and return year ending exams in time?</p> <p>Do extra tasks like year ending exams have hidden costs and have the potential to cost money and expand the bureaucracy?</p> <p>If principals are the key to having a good school what have we done to strengthen their position? We have only increased accountability for administrators and consequences for them. We still have not let them pick their players, cut bad players, or implant their own game plan. Why is the principal the accountability focus when they do not have the tools we give to a high school football coach? Why do we have a disconnect between accountability and the classroom teacher? Teachers are smart people? This may be the essence of why we can not recruit new principals. They see us being accountable and responsible for results when we do not have the tools that managers in every other profession view as essential and non-discretionary. The next frontier of educational improvement in West Virginia may be strengthening the role of the principal.</p> <p>I believe the policy to base the instructional day on a 75% minimum attendance is unfair to individuals and schools with good attendance. I don't think this policy will deter truancy or have any significant impact on attendance. It will only punish those who</p>		
5/22/02	Ron Cantley, II			
5/22/02	Elaine Wine, Sutton Elementary School, Sutton, WV			

DATE	INDIVIDUAL/ ORGANIZATION	COMMENTS	ACTION/TYPE	RATIONALE
5/22/02	Elaine Wine, Cont'd Charlotte Hutchens, Raleigh County Schools, Beckley, WV	<p>already strive for good attendance. 126-42-5 Glossary The glossary is a good reference item. It helps clarify several concepts.</p> <p>126-42-6 6.4.15 I still have concerns about the end-of-course exams. We must have assurance the exams will be scored and returned in a timely manner. The language of "no less than 15%" implies the exam could count for more. This could cause discrepancies among schools and counties. An across the board standard would be better.</p> <p>6.4.16 The state requires 24 credits and I know a county can exceed that and will have to in order to schedule all students for the full instructional day for 4 full years. Otherwise, a student, on block, would have to take 8 electives (32-24=8). Additional courses are costly because you must have the personnel to teach the classes.</p> <p>7.2.12 Is the 75% requirement by school or county? There are numerous problems either way. a) schools within a county would have a different number of days b) teachers within county would be working a different number of days, some making up days, others not c) when would days be made up d) what would be implications for calendar e) If one school did not meet 75% requirement, would entire county have to make up day</p> <p>7.2.14 c) The idea of extra-curricular activities not accounting for more than 1% of instructional time is going to be extremely difficult to track. It will add to the paperwork burden.</p>		
5/22/02	Cynthia J. Robinson, Secretary, Sutton Elementary School, Sutton, WV	<p>I am very concerned about the changes in Policy 2510, and more specifically referencing item #4, to-wit: "The percentage of students that must be in attendance in order for a day to be considered an <i>instructional day</i> has been specified at 75% (Secs. 5.39 and 7.2.12). Rural schools do not have the privilege of an attendance director to phone each day when a child is absent. Teachers do the best they can during planning periods, however, do not always have the time to sit and make several phone calls regarding absenteeism.</p> <p>This rule is unfair because it does not address the problem. There will be problem days such as days before and after holidays and breaks and whole school field trips (where parents choose not to let their children attend). Elementary school age children are more susceptible to the viruses and flues that cause extended absences. There are times when the weather causes students who attend rural schools to miss.</p> <p>I disagree with this policy and would hope that careful consideration is given before any</p>		

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5/24/02	Cynthia Robinson, Cont'd Stephanie Eiswick	<p>final decision is made. Thank you.</p> <p>I am not pleased with the proposal of holding each individual school accountable for 75% attendance. It seems to be setting up an endless cycle of problems. Flooding, Snow/Ice, and the winter flu outbreaks affect each student differently. For example: Our neighborhood is not inhibited by flooding but several areas in our school district are. Should my kids, (who can always get to school), be forced to attend extra days simply because of limited bus runs??? If my child attends during a winter flu outbreak and the school dips below the 75% mark should they then be required to sit in school extra days in the summer?? I, for one, would not send them on the extra days if they had attended the "sub-75% days." Several parents feel the same way. So, what happens when the make-up days are poorly attended? Will they not count either??? Are we going to have rural schools going to school most of June because of bad weather or flooding while their city counterparts get out in May? This policy may look good on paper but it is terribly unrealistic and prejudiced.</p>		
5/24/02	Sandra Wolenski	<p>Concerning Policy 2510</p> <p>5.39. Instructional Day - Time allocated within the school day for the teaching and mastery of content standards and objectives. The minimum instructional day for K-4 is 315 minutes, 5-8 is 330 minutes, and 9-12 is 345 minutes. (See Sec. 7.2.12) A minimum of 75% of the school's students must be in attendance as defined by Policy 4110 in order for the day to be counted as an instructional day.</p> <p>This is not practical for these reasons:</p>		
		<p>1. If the decision to not count a day as an instructional day is determined on a school by school basis, the bus connections in rural counties would be impossible.</p> <p>2. How will we know the school's attendance until the day has begun? Do we send the students home if the % is not 75%? Do we close the entire county or just that 1 school? How would parents who would have to arrange for child care have time to make arrangements? Working parents need to know ahead of time in order to be sure their children are being properly supervised. Many elementary students would not know where to go if sent home early.</p> <p>3. How would days be made up by staff that has reported for work?</p> <p>4. How would days be made up if 1 school were closed? Only that school would make up the day or would the entire county have to attend? (see bus issue #1)</p> <p>5. Would the end of year date be moved if the number of days to make up exceeds the available OS days?</p> <p>Please consider these concerns before passing Policy #2510.</p>		

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5/24/02	Becky Fama, Stanaford Elementary	Please look at the section of 2510 which states that attendance must be 75% to constitute an "instructional day". What happens if we don't have 75% attendance? Is this school-wide or per classroom? Do we add another day of school? Do students, teachers, bus drivers, cooks, etc. who attended have to come on the "extra" day. How will you pay them? I am a kindergarten teacher and it is not unusual for me to have 5-6 children absent in the winter due to illness or icy roads.		
5/24/02	Letha Domingues, Stanaford Elementary	I have a real concern about the Section 2510 which states that attendance must be 75% to constitute an "instructional day". What happens if we don't have 75% attendance? Is this school wide or individual classroom? How will this effect teachers, bus drivers, cooks, aids. Are we paid extra for these days.		
5/24/02	Roger Perdue, Administrative Assistant, Marion County Schools	126-42-5. Glossary Career Major Unit needs defined in glossary. 5.39 The requirement that a minimum of 75% of the school's students must be in attendance....should be county's students - this would be more manageable. 5.49 Definition needs to be consistent with 8.2.6 & other references. 5.59 Exempt should be changed to waived or another appropriate word. 5.67 Suggestion that second sentence read "The minimal credit that may be awarded is one-half (1/2) unit. 5.26 Other articulated course(s) methods should also be defined along with "dual credit" courses 126-42-6 Program Definition With the addition of Civics as a 4 th Social Studies Requirement, The Arts credit should be opened to applied practical arts as well as fine arts. Page 34 Should Foreign Language also have the *** qualifier for substitution Page 35 The four concentration units...must be consistent...Does this mean a direct match or only a relevant consistency? *****Language should be adjusted. "Shall" is too restrictive. Who is going to pay for student credentials? Under work-based learning suggest that language read "all students must participate in work based learning experiences..." Remove "a" and making "experience" plural. Page 36 Why all the "advanced" prefix? AP, ap, honors, etc is confusing enough. Science seems to be the only area with this concept. Page 37 Again the "Arts" requirement should be more encompassing including applied practical arts. Page 44 7.2.7 I am adamantly opposed to requiring a program area advisory council (in each technical concentration. This is a laudable goal but not practical as a mandate. We have a exorbitante number of required committees as it is. Page 55 7.4.1 Does this mean they must attend the principal's academy or only be able to demonstrate requirements? This would severely limit administrative available pool to those in WV. Page 59 D. This statement needs more definition. Does scheduling mean time or duty scheduling? Page 60 7.6.5 "practical" instead of "practicable"		

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5/24/02	Tom Deadrick, Marion County Schools	<p>5.12: The name Career Majors is confusing to parents who want to equate this with a college "major." The wording should be something like Career Focus.</p> <p>5.26: Is the 8100 minute issue applicable to dual credit courses? If high school credit is to be awarded, do they need to meet this minute requirement the same as required for other high school courses. If not, it should say so—but this then creates a double standard!</p> <p>5.29: "Required" electives needs to be defined. This statement is vague. Parents often ask how we "require" electives!</p> <p>5.49: The language used needs to be consistent. Section 8.2.6 refers to the plan as a "transition" plan not an "education" plan.</p> <p>5.59: This language does not appear to meet the intent of this option. They really are not being exempt from a course as much as <u>substituting a course</u> in place of the required one.</p> <p>5.67: Does the language of this section allow the awarding of ¼ credits?</p> <p>5.68: Does the 8100 minutes apply here? Again, if not, you are creating a double standard where this applies to some courses and not others.</p> <p>6.4.6: Does this section allow us to award credit for dual credit, college courses and/or virtual school courses? It specifically talks about tested/demonstrated masters associated with...8100 minutes of instruction time. These other situations will possibly not have 8100 minutes scheduled!</p> <p>6.4.12: Again, does the 8100 minutes apply here?</p> <p>Footnote ** on Chart IV (A): The word "exempt" is not accurate since they are taking another course in lieu of the required one.</p> <p>Chart IV(B) – Career Major Credits table: This whole idea defeats the concept of Career Major and Career Clusters whereby students are taking courses in their identified area of interest that will give them an idea of the field. (e.g. a student in the Business Cluster taking an accounting course, etc.)</p> <p>This becomes another unfounded mandate when you are adding additional math and science courses to a majority of students. A majority of students do in fact select the professional path. Additional teachers will be required to offer these!</p> <p>Do WV colleges require 2 years of foreign language? If not, why is it required here?</p> <p>This chart does not indicate that the additional math and science must be of a higher level than that previously taken. Without this language, students will figure out that they can take something lower than they already had and still meet this new requirement.</p> <p>It would seem more appropriate to perhaps require a computer type course if you are looking at a way to circumvent the courses already selected at the local level to fulfill this need. Our county followed the state model for courses related to clusters and majors,</p>		

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	Tom Deadrick, Cont'd	<p>with tweaks to meet local needs, and now this appears to say that this is not correct or acceptable.</p> <p>The allowance to substitute courses does not indicate that they are relevant to their chosen program of study (cluster and major).</p> <p>If the state is going to select the generic courses with one size fits all for this, then why continue with the clusters and majors.</p> <p>This is very frustrating to us on the local level who fought hard battles to implement the policy and Senate Bill 300. What they say is really true -- just wait and the state will change their mind and this too will go away! This newest proposal verifies this.</p> <p>Chart on Work-Based Learning: The wording has "a" work-based learning experience as though one small job shadowing would satisfy this. The wording should be in "work-based experiences."</p> <p>Footnote * on Chart IV (B): This is not possible for all students. What about the student that fails Applied Math I and must repeat it his 10th grade year? He cannot do this! What about the student that takes Alg-Geo Pre in grade 9 and Applied Math I in grade 10? He does not meet this.</p> <p>Charit V: Why are the science courses called "advanced?" Isn't Biology just Biology? We don't name it Advanced Geometry so why the Advanced Environmental Science, for example? Why isn't it Advanced Human Anatomy?</p> <p>7.2.7: Having an advisory council for each technical concentration is overkill! This causes way too many committees for a school to handle.</p> <p>7.2.13: Part of this statement allows vocational centers to have a different standard that other schools in not requiring 8100 minutes of instructional time just because of travel time. This creates a double standard under which we are operating. At one time we say students must be scheduled for 8100 minutes and then say that as long as they can show mastery, then the course can be less than 8100 minutes. Which standard are we using? The option that had been presented earlier in reducing their elective requirements due to travel time would work the best since it does not create a double standard with the issue of 8100 minutes!</p> <p>7.3.1 (q): Instead of "band" presentation it should read "music" since band is covered by SSAC rules as mentioned in the previous section that defines the use of bank time. Why is band treated differently?</p> <p>7.4.1: Does this say that all supervisory/administrative staff employed in the Central Office must have administrative certification and have attended the principals' academy? Only principals are invited to the principals' academy and it is not open to others! Do curriculum supervisors require an administrative certification? This standard makes no</p>		

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	Tom Deadrick, Cont'd	<p>sense!</p> <p>7.4.1 c: Why is classroom hyphenated? 8.2.4 (after I): Why is "college credits earned" bulleted? 8.2.4: How is this to be accomplished? There is not a common database from which to pull all of this information. This is not something that WVEIS does. Has this been fully thought out as a how to do this? 8.2.5: This appears to only be applicable to 9th grade students since students in grades 9 and above do not take a standardized test to give the data required for this standard. All students in 9 through 12 take end-of-course exams. 8.2.6 (b) (A): When does the student select a pathway? A previous chart relies on the selection of a pathway for taking additional math, science or technical concentrations but where do they indicate their chosen pathway?</p> <p>The concept of selecting a major is worthless since a previous graduation requirement chart refers only to pathways. Why go through the needless process for professional path students when it is meaningless?</p> <p>8.2.b (b) (B) (d) (C): The title has capital letters that I believe refers to the College Board's Advanced Placement program. When in lower case I understand it refers to honors and advanced courses. The definition here differs from that given in the glossary at 5.36. Does the 8.2.6....refer to just the College Board program? If so, the advanced satellite or Internet courses are not applicable. Also, the semicolon after College Board is not needed.</p> <p>8.2.6 (Assessment of Plan – however that is numbered – very confusing): What is this an assessment of—their high school education, their transition plan, what?</p> <p>Rationale</p> <p>We must create significant change within our current middle level schools if we are to build an effective, high performing middle childhood education program. Stated simply, we must stop trying to make our middle grades schools, as they are, better. Instead, we must make them different. If we are to create middle grades schools that are academically excellent, developmentally responsive and socially equitable, we must set parameters within which individual schools, with their unique needs due to various grade configurations, may establish those structures and organizational arrangements that will support and sustain their trajectory toward excellence, and monitor student progress toward mastery of the content standards and objectives annually.</p> <p>Policy 2510 is written in support of junior high school programming. The language in this policy restricts the local school system by reinforcing those very practices that have not, and do not, work for students in grades 5-8. As currently written, Policy 2510 allows schools to continue as they have been operating without seriously, and intentionally, addressing the issues of academic rigor and social equity within a developmentally appropriate instructional environment in grades 5-8.</p>		
5/24/02	Carla Williamson, WWDE			

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	Carla Williamson, Cont'd.	<p>We must remain cognizant of the unique characteristics of the young adolescent. Children between the ages of 10 and 14 do not need either the protected coddling of the elementary school or the alienating subject departmentalization of the high school. They need a bridge between the two. If we are not careful, too many requirements of the adolescent program will be passed to the middle childhood program, and we will, in truth, continue to dismantle existing middle childhood programs in the State.</p> <p>Staffing in the middle grades has already been reduced in many counties as local school boards strive to meet the mandates of both elementary and adolescent programs. The squeeze is impacting middle childhood programming across the State. Class size in the middle grades is increasing; teaming and personalization of the learning environment are disappearing.</p> <p>If we are to build a successful middle childhood education program, we must remove the randomness of interpersonal associations for the young adolescent and require the schools to build organizational structures that allow the teachers to become more knowledgeable about their students and to work together to meet their needs. Teachers at the middle level must strive to build relationships with students and parents.</p> <p>For these reasons, we cannot continue to make the middle grades, as they are, better. We must make them different. Policy 2510 must include the language necessary to build a program for middle childhood education. Because those qualities or characteristics that set middle childhood education apart from early childhood or adolescent education are not addressed in Policy 2510, I make the following recommendations.</p> <p>Recommendations</p> <p>6.3.2. add the words "unique, age-appropriate" "<i>Middle childhood education builds upon the results of early childhood education and provides unique, age-appropriate education opportunities...</i>" This is supported by 6.4 Programs of Study "Programs of study are introduced, emphasized and delivered in different ways at the four programmatic levels."</p> <p>Read the following with a lens on Middle Childhood Education and the requirements outlined for grades 5-8 in Policy 2510. We must establish parameters and allow our middle grades professional staffs the flexibility necessary to accomplish our goals related to student mastery of content standards.</p> <p>6.4.7 Students who demonstrate mastery of content standards and objectives must be provided opportunities to progress to the next level of instruction.</p>		

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	Carla Williamson, Cont'd	<p>Allow this statement to stand as written and eliminate the 8100 minutes (45 minutes daily) currently required for high school credits earned prior to grade 9.</p> <p><u>OR</u></p> <p>7.2.13 addresses the scheduling of class periods in a manner that results in fewer than 8100 minutes of instructional time allotted for a high school course credit and makes provisions for vocational centers. Add middle grades schools to this exception if we must keep the 8100-minute requirement.</p> <p>8.2.5 requires a skill improvement program at grade 8. Should be grade 6. If we want them in Algebra I in grade 9, grade 8 is too late.</p> <p>Rationale for Revision of Chart III (Page 5-8)</p> <p>By adopting the language to support teaming of teachers, especially in the core subjects, we can empower teachers and principals to determine time allocations based on the needs of students. (7.2.11) Students who need extended time in reading, language or mathematics (7.2.2b and 7.2.5) could be scheduled accordingly within the core team block. We must structure grades 5-8 to effectively address the academic, social and developmental needs of any student who is deficient in the basic skills of reading, writing, mathematics and technology. A one-size fits all curriculum will not do this.</p> <p>Middle grades schools across West Virginia have placed students, in grades 5-8, with deficiencies in reading, writing and mathematics into extended instructional periods to address identified deficiencies. <u>Teachers and principals believe the student is better served by addressing the deficiencies at the beginning of the middle childhood experience, as opposed to a required basic skills program at grade 8, but this requires flexibility in scheduling to meet the needs of the individual student.</u> Due to staffing and other constraints, some schools are unable to do this. Some schools that are currently doing this are now experiencing difficulty due to the foreign language requirement.</p> <p>Policy 2510 speaks to providing "specific instructional programs based on the needs of students," allowing students who "master the content standards and objectives to move to the next level of instruction," and "attaining mastery of the basic skills in reading, writing, mathematics and technology." However, the Policy, as an entire document, restricts the middle childhood staff in their efforts to make these things happen for students in the middle grades.</p> <p>Example 1</p> <p>Granting high school credit for Level 1 of a foreign language and Algebra I at the middle childhood level requires that these classes meet for a minimum of 45 minutes daily to acquire the required 8100 minutes of instruction for a high school credit. This imposes 45 minutes instructional blocks, within a minimum 330-minute instructional day, on middle grades schools. The teachers who teach these courses also teach other courses without a 45-minute requirement, but the middle school is required to make all courses 45</p>		

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	Carla Williamson, Cont'd	<p>minutes in length because of the interconnectedness of the master schedule.</p> <p>Example 2 In order to address serious reading deficiencies at the middle level, a number of our schools offer a reading, or literature, course separate from Language Arts. Schools call it Literature when they do not have a teacher certified in Reading to teach the course. These schools often have strong instrumental or vocal music programs, and many of your foreign language students also choose to participate in the music programs. According to Policy 2510, these schools would be required to offer the following courses:</p> <ol style="list-style-type: none"> 1. Reading/Literature 2. Language Arts 3. Mathematics – Algebra I 4. Science 5. Social Studies 6. PE/Health/Art/Music 7. Foreign Language 8. Instrumental or Vocal Music <p>Developmentally appropriate middle grades schools should also have an advisory program. If we require these schools to schedule 8 courses for 45 minutes each, we have exceeded the 330-minute minimum by 30 minutes, and have left no time for an advisory program where students have regular contact with their adult advocate. We have also failed to address programs such as gifted education.</p> <p>I recommend that we include language that encourages school staffs to think in terms of flexibility within the scheduling process—flexibility within given blocks of time for a particular grade, as well as flexibility across the middle grades.— to meet the needs of students. By placing more emphasis on the teaming of teachers and students, and the allotment of an instructional block of time for instruction in the core subjects, we would be providing our schools with the flexibility necessary to address all the mandates placed upon them and to personalize the learning environment through the implementation of small, personalized learning communities.</p> <p>By designating a minimum of 165-200* minutes per core team (Reading, English Language Arts, science, social studies and mathematics), we will establish realistic parameters, while allowing for flexibility. Also keep in mind teaming of teachers and students allows flexible scheduling of instructional minutes on a daily basis. Only two of many possibilities are given below.</p>		

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	Carla Williamson, Cont'd <u>165-Minutes for Core Team</u> Reading and English – 40 minutes Social Studies – 40 minutes Science – 40 minutes Algebra I – 45 minutes <u>200-Minutes for Core Team</u> Reading 40 English 75 Science 40 Social Studies 40 Algebra I 45 Interdisciplinary Reading English LA & Soc. Studies – 75 Science – 45 Pre-Alg/Geometry - 45 Reading 40 English 40 Science 40 Social Studies 40 Pre-Geom/Algebra 40 When we schedule students in a random impersonal manner, as we do in junior high schools, we eliminate the potential of flexible scheduling to meet the individual needs of students. More importantly, placing students and teachers in smaller personalized teams will allow us to better serve all students in the middle grades. My remarks have not addressed a Related Arts Team that would encompass art, music, physical education and health, as well as any other electives or required electives offered by an individual school, but the same flexibility would hold true for these courses. See sample schedules on page 5. To effectively schedule and deliver a middle grades instructional program that is research-based, we must step outside the secondary "junior high school" box. This will require training in master schedule building for all principals. Teachers will also have to be guided in a new way of thinking about time and how they utilize time effectively to target the content standards and objectives. See <i>samples of a master schedule that allows flexibility for grades 7 & 8</i> <u>Closing</u> The adoption of research-based practices is cited as a strategy for achieving the West Virginia Goals and Refined Goals, but as it is written, Policy 2510 does not address the research related to Middle Childhood Education and the unique needs of this learner. Research-based practices for middle childhood education include small, consistent learning communities with a personalized learning environment where teachers know their students and maintain close working relationships with the home. You will see an adult advocate or mentor for every student who takes an interest in the student's			

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	Carla Williamson, Cont'd	<p>successful learning, goal setting, career planning and personal growth. The curriculum is organized around concepts and principles and based on rigorous content standards. Classroom practices actively engage every student in learning experiences that are relevant and cognitively engaging. Data-driven decision-making keeps options open for all students by immediately addressing their academic needs.</p> <ul style="list-style-type: none"> • These numbers are arbitrary, but do establish an expectation that the minimum number of instructional minutes per core class would average 40 minutes per day. <p style="text-align: center;">Carla Williamson, Coordinator Middle Childhood Education</p> <p>Sample Schedules for Grades 7 & 8 (See Attached Chart)</p> <p style="text-align: center;">Recommended Revisions to Chart III Middle Childhood 5-8</p> <p>High-performing middle grades schools are academically excellent, developmentally responsive and socially equitable. These schools expand access to higher level content and instruction to include all students, and they challenge all students to use their minds well. The staffs are sensitive to the unique developmental challenges of early adolescence. In these schools you will see small, consistent learning communities comprised of teachers and students. High-performing middle grades schools keep positive options open for all students.</p> <p>The core programs of study are based on rigorous content standards and shall be taught daily by a team of qualified teachers. The core programs of study will be offered within a block of time equal to a minimum of 165 minutes daily*. Assessment and evaluation promote learning. A reteach component will ensure mastery of the content standards and objectives at each grade level. The principal and the team of teachers will determine time allocations that effectively address the academic needs of students who are deficient in the basic skills of reading, writing and mathematics.</p> <p style="text-align: center;">Reading and English Language Arts Mathematics Science Social Studies</p>		



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	Carla Williamson, Cont'd	<p><i>*If Reading and English Language Arts are taught as separate subjects, the core block should equal a minimum of 200 minutes</i></p> <p>These required programs of study shall be taught at each grade level each year as separate subjects within a related arts block of instructional time.</p> <p style="padding-left: 40px;">Art Music* Physical Education Health</p> <p><i>*Choral and instrumental music must be offered no later than grade six. Chorus or instrumental music may replace the required Music course at each grade level.</i></p> <p style="padding-left: 40px;">Foreign Language</p> <p><i>The teaching of foreign language as a separate program in grades five and six is encouraged.</i></p> <p>Two years of the same foreign language must be offered for students in grades seven and eight. The foreign languages to be offered must be taught at the high school the middle school students will attend. Schools may choose from two learning sequences:</p> <ol style="list-style-type: none"> 1. Seventh grade exploratory course(s)/Eighth grade Level I of the foreign language. Students will receive one high school credit at the end of eighth grade upon mastery of the content standards for the Level I course. 2. Seventh grade Level 1A of the foreign language/Eighth grade Level 1B of the language. The level I course is delivered over a two-year period. <u>Students will receive one high school credit upon mastery of the content standards for the course.</u> <p>These required programs of study shall be taught annually within the instructional day. They may be integrated or taught as a separate course.</p> <p style="text-align: center;">Career Exploration** Developmental Guidance***</p>		

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	Carla Williamson, Cont'd	<p>**These experiences based on content standards and objectives must be provided to students during grades five through eight. Where feasible, consideration should be given to using modular technology education labs to enhance career exploration.</p> <p>***Developmental Guidance may be integrated or taught as a separate course. Placing developmental guidance within an advisory program is encouraged.</p> <p>Career Awareness and the application of technology shall be taught in all programs of study.</p> <p>Students demonstrating mastery of instructional grade level objectives in the subjects are to be provided the opportunity to advance to the next grade level objectives.</p> <p>Students in grades 5-8 shall be provided with an adult advocate or mentor who takes an interest in the student's successful learning, goal setting, career planning and personal growth. Schools are encouraged to implement an organized advisory program to meet this requirement. Implementation of an advisory program will allow the schools to remove the randomness of interpersonal associations for students by personalizing their learning environment.</p> <p>Schools are encouraged to deliver all courses outside the core programs of study within a related arts block of instructional time. This will allow flexibility in scheduling individual students in a manner that is appropriate and consistent with their diverse needs and interests.</p>		
5/24/02	Peggy Cook, Stanaford Elementary School	<p>I am very concerned about the section of 2510 which states that attendance must be at 75% to constitute an "instructional day". What happens if we don't 75%? Is this school wide or per classroom? Is there another day of school added as an "extra day"? What happens if we have an epidemic of sorts - childhood diseases or flu? Do teachers, bus drivers, aides, cooks, students, etc. who attended have to come the "extra" day? How are they paid?</p> <p>Mr. Luff, please clarify some of these issues, and explain the fairness of this when compared to allowing secondary students absences for WVSSAC Activities.</p> <p>Please clarify Secs. 5.39 and 7.2.12. Is this referring to school, county, or state? Are special exceptions going to be made concerning childhood diseases? Ex. Chicken Pox also, will flu epidemics or closely related illnesses be the exception to this ruling?</p> <p>Please explain how this ruling could be "fair" in comparison to the secondary students that are allowed to be dismissed during the "instructional day" for extra-curricular activities are excluded. Why should those students be excluded from instruction? Is this ruling just for elementary students? Is this ruling fair at all?</p> <p>Will the secondary students have to make up the time? Will there be extended days to</p>		
5/24/02	Sue Miller, Stanford Elementary			

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5/24/02	Sue Miller, Cont'd Michelle Levin, Stanford Elementary	Please clarify these issues for me. Please clarify for me <u>Section 2510</u> that states that attendance must be 75% to constitute an "instructional day". 75% of our school, our county....? Also what happens if we don't have 75% attendance?		
5/24/02	Ronald E. Ray, Superintendent, Jackson County Schools	§126-42-5. Glossary 5.39 Instructional Day – While 75% attendance is certainly low by current expectations and performance, to change a day from instructional to non-instructional if less than 75% of the students attend on any given day is not logical. There could be many different circumstances that could cause this to happen. Why not do away with Faculty Senates and have a legitimate 180 day of instruction. §126-42-6. Program Definition The requirements for a third year of a foreign language offering and the addition of a credit in civics will probably require additional staff and, therefore, additional funds contrary to fiscal note attached to the policy. Students in the professional pathway must take two years of a foreign language and will utilize the time allotted to current foreign language staff. If additional courses are going to be required, they should at the very least be funded.		
5/24/02	Cindy Daniels, Kanawha County Schools Management Team	§126-42-6. Program Definition 6.4.2 State needs to develop unified grading scale, especially with implementation of PROMISE requirements. No uniformity currently. 6.4.16 Most high schools have completed scheduling for next year. What about students who have already scheduled for the senior year that don't have a full schedule? Counties need to be given one year to implement this requirement. Scheduling was completed prior to the policy going out for comment. Also, we have a few students who have applied for early graduation next year. What do they do now? We need a year to implement. When is the county policy due? 8.2.6 B Higher level substitution – this needs to be clarified/explained. Interpreted to mean that AP courses cannot be substituted for required courses in English, Soc. Studies, etc. contradicting. Please clarify. Error on p 27 Chart IV B – Core adds up to <u>17</u> , not 16. 7.2.12. Needs to be deleted. What does this mean to schools districts? Do schools have a make up these days? What about staff? Think about inclement weather, SSAC tournaments, etc. 7.2.14. Please clarify WVSSAC sanctioned events – Does this mean <u>any</u> WVSSAC sanctioned event or just tournaments? P 49 – D What is the process for substituting another course for 4 th math or science? Who "makes the call" that the substitution is more relevant? Will this be additional paperwork for counselors? Do parents have to agree and sign off? Too complicated, confusing. Additional math and science will require 11.5 additional teachers for Kanawha County.		

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5/24/02	Curriculum Assistant Principals, Kanawha County Schools	<p>§126-42-6 Program Definition Page 27 – Chart IVB – Please consider Kan Co. current model of .5 civics/.5 economics requirement for <u>all</u> seniors. Economics is needed and should include financial literacy objectives.</p> <p>5.4.15 When are end of course exams given? Who grades them?</p> <p>7.2.12 Delete 75% attendance requirement. This could cause huge problems in Kan. Co. with make up days, etc.</p> <p>8.2.4 Please clarify substitute courses specifically AP for.....unable to read remainder of sentence on fax.</p>		
5/24/02	Charles Tucker, Principal, Cedar Grove Community School	Please eliminate the standard that requires 75% attendance for individual schools to be considered as an "instructional day". Schools that have an epidemic of influenza may not meet those standards.		
5/24/02	Kristi Clay, Special Educator, Robert Tipane, Music Instructor, Kathy Lewis, Special Education Aide, Sherry Dyke, 2 nd Grade Teacher, Sallie Cruz, 2 nd Grade Teacher, Stanaford Elementary	<p>During our Faculty Senate Meeting we read Policy 2510 and have some major concerns. The 5.39, Instructional Day is written to have 75% of the school's students in attendance in order to have an instructional day. What if you are present and teaching a day that has less than 75% in attendance? Do we get paid for that day and do we have to repeat it later? How is this possible? How will service administrators, personnel, teachers, and other school staff be compensated for their extended time? From where will the funding come? Will snow days, no bus runs, and late arrival days affect this formula? Do the students who are in attendance on those days have to attend additional days? Do health epidemics come into consideration at all? Why should we be accountable for what occurs outside of our control.</p> <p>There is also concern regarding "Banked Time" (Sec. 5.6). This policy stated that only 1.8 days may be used for extracurricular activities. This does not allow the necessary time for elementary schools to enrich the student activities. Secondary schools are afforded the opportunity to include athletic events that are covered under the blanket of SSAC however, elementary schools are not sanctioned under SSAC. How will this affect our Responsible Student Programs. Elementary staff and students work many hours beyond the school day in preparation for after school athletic events including tournaments, practice, competition and preparation for competition. These include but are not limited to Music programs and concerts, Science and Social Studies fairs, Math and Writing contests and athletic events. It will also be difficult to implement incentives for students who achieve and accomplish goals.</p>		
5/28/02	Robert Sisk, Director, South Branch Vo Tech Center	<p>It is important that we as educators acknowledge student success, achievements and hard work. This should include academic and athletic areas.</p> <p>I am concerned about more courses being required to be offered with less or not enough teachers available. South Branch has already felt pressure to offer the foundation classes from the participating schools and/or counties. SBVT does not have personnel</p>		

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	Robert Sisk, Cont'd	<p>That can meet these needs.</p> <p>I feel that the 1 credit for Arts should include applied arts as well as fine arts. (p. 27), I think the requirement to have students attend school for a full day is an excellent idea but many schools with block scheduling only requiring 24 credits to graduate have created a less than 12 year school program, some school have students meeting H. S. requirements after 11 years and one semester. Students need to be enrolled in either college or career bound classes under supervision. This would avoid the infamous "senior slump".</p>		
5/28/02	Bob Shook, President, Keith Funkhouser, Vice President, Mary Aronholt, Member, Donald Ashby, Member, Michael McDowell, Member, Mineral County Board of Education	<p>We, the President and Members of the Mineral County Board of Education, urge the W. Va. Board of Education to refrain from adopting policies that create unfunded mandates for local boards of education.</p> <p>We only oppose Policy 2510 due to the financial burden placed upon the Mineral County Board of Education. It is anticipated that the cost to our Board of Education to be approximate \$140,000.00 annually.</p> <p>To implement the W. Va. State Board of Education mandated middle school foreign language program next year will cost approximately \$106, 000.00 annually. Again, we only oppose that policy due to it being unfunded.</p> <p>The Mineral County Board of Education cannot continue to absorb these unfunded mandates. We have very little discretionary funds. Usually, in order to provide for unfunded mandates, we defer or eliminate maintenance to our facilities.</p> <p>Again, we urge you to avoid policies that create unfunded mandates.</p>		
5/28/02	Sandra Wolenski	<p>Concerning Policy 2510</p> <p>5.39. Instructional Day - Time allocated within the school day for the teaching and mastery of content standards and objectives. The minimum instructional day for K-4 is 315 minutes, 5-8 is 330 minutes, and 9-12 is 345 minutes. (See Sec. 7.2.12) A minimum of 75% of the school's students must be in attendance as defined by Policy 4110 in order for the day to be counted as an instructional day.</p> <p>This is not practical for these reasons:</p> <ol style="list-style-type: none"> 1.If the decision to not count a day as an instructional day is determined on a school by school basis, the bus connections in rural counties would be impossible. 2. How will we know the school's attendance until the day has begun? Do we send the students home if the % is not 75%? Do we close the entire county or just that 1 school? How would parents who would have to arrange for child care have time to make arrangements? Working parents need to know ahead of time in order to be sure their children are being properly supervised. Many elementary students would not know 		

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	Sandra Wolenski, Cont'd	<p>where to go if sent home early.</p> <p>3. How would days be made up by staff that has reported for work?</p> <p>4. How would days be made up if 1 school were closed? Only that school would make up the day or would the entire county have to attend? (see bus issue #1)</p> <p>5. Would the end of year date be moved if the number of days to make up exceeds the available OS days?</p>		
5/28/02	Gary D. Webb	<p>Please consider these concerns before passing Policy #2510.</p> <p>As an educator I am concerned with some of the changes to Policy 2510. Listed below are ones that need definite clarification:</p> <p>1. #4 The percentage of students that must be in attendance in order for a day to be considered an "Instructional Day" has been specified at 75%(sec 5.39 and 7.2.12). Does this mean a classroom, school or county? What about the students and teachers who are attending school that day. Will will they have to go an extra day? If for some reason (snow ,ice, flooding) and some bus can't run, do the other students that did come to school have to make up that day also? In Elementary Schools where some contagious diseases or viruses cause many students to be absent . Do the ones who do come to school have to do that day over too?</p> <p>This is not practical for these reasons:</p>		
5/28/02	Gayle Allen, Kindergarten Teacher, Springfield Green Spring Elementary, Hampshire County	<p>1.If the decision to not count a day as an instructional day is determined on a school by school basis, the bus connections in rural counties would be impossible.</p> <p>2. How will we know the school's attendance until the day has begun? Do we send the students home if the % is not 75%? Do we close the entire county or just that 1 school? How would parents who would have to arrange for child care have time to make arrangements? Working parents need to know ahead of time in order to be sure their children are being properly supervised. Many elementary students would not know where to go if sent home early.</p> <p>3. How would days be made up by staff that has reported for work?</p> <p>4. How would days be made up if 1 school were closed? Only that school would make up the day or would the entire county have to attend? (see bus issue #1)</p> <p>5. Would the end of year date be moved if the number of days to make up exceeds the available OS days?</p>		<p>Please consider these concerns before passing Policy #2510.</p>

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5/28/02	Jaclyn Smith	<p>I have major concerns with Policy 2510. As an educator in Raleigh County I feel that 5.39. Instructional Day is ridiculous! Seventy-five percent of students must be in attendance for that day to be counted as an instructional day? Will I be paid for the days I teach to less than 75% of my class? Do the students who are in attendance on those days have to attend extra days because of the absences of their classmates? Also, how will the extra days of school be funded? Did you forget that teachers, administrators, service personnel, and other school staff must be compensated for these days? Will snow days, late arrival days, and days in which the weather is bad and busses do not run be counted in this silly policy?</p> <p>Comments re Policy 2510---</p>		
5/28/02	Sally Martin, Music Specialist, Shady Spring Elementary, Raleigh County	<p>1. There seem to be very few advantages of having "bank time" now. This seems in effect, then, to encourage schools to shorten the length of the school day. As usual, though, sports once again seem to be excluded from this issue. Since Policy 2510 emphasizes 180 days of instruction, then it seems there should be no exceptions, and especially no exceptions made for something like sports, upon which there is already too much emphasis.</p> <p>2. How will 75% attendance be determined in considering an instructional day? Will it be school-by-school or on a county basis? If so, then please consider that when a high school's football or basketball team plays in a state tournament during the day, attendance at that specific school will most likely drop below 75%. Is it equitable then to say that all schools in that county have not met the 75% requirement and that the day should not be counted as an instructional day? One must also consider inclement weather and hazardous road conditions. If buses do not run, but schools remain open for those who can make it, shouldn't this day be counted towards instruction even though attendance may be below 75%?</p> <p>3. The requirement that all high school students be scheduled for the full instructional day for all four years sounds fine on paper, but will counties, whose budgets are already stretched thin, be able to find the funds to hire personnel for the additional classes that will be needed?</p> <p>4. Who decided that a year's worth of learning takes place in 180 days? Why is that the magic number? I've known many, many students who "get it" in 100 days, but I've also known many students who wouldn't "get it" if the school year were 500 days. It would be nice to see the SAT9 (or other standardized test) given in January or February and immediately graded. Those who score in the 90th percentile would have the option of ending their school year then or advancing to the next grade. Those who score under the 89th percentile would continue in school for the remainder of the year and perhaps even require additional schooling in the summer.</p> <p>Since Policy 2510 addresses the quality of education, I maintain that there are other</p>		

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5/28/02	Sally Martin, Cont'd David Nuzum, Assistant Principal, East Fairmont High School	<p>more important areas that need to be considered. These include (1.) more advanced placement classes for high school students . Students from WV who attend highly ranked colleges out of state find that they are at a disadvantage because of the limited number of AP classes available to them. (2.) Stricter enforcement of truancy laws, especially in regard to parents who find it necessary to take their children out of school for one, two, or three weeks at a time for family vacations to Disney World, Myrtle Beach, etc. This is a major problem already and seems to be increasing each year. Many parents already wait until after Labor Day to send their children to school, then schedule vacations during the school year, and then see fit to allow their children to miss school after Memorial Day. There is also a growing problem with children who miss for hair appointments, doctor/dental appointments, and even grocery shopping.</p> <p>I have some concern with the bank time provisions of policy 2510, section 7.2.14.c. While I certainly support the section's protection of instructional time, I am concerned with the effects that the 1% of instructional time limitation will have on high school extra-curricular programs when applied in a cumulative fashion.</p> <p>While we limit any loss of time for trips other than those co-curricular in nature, two examples come to mind in our school.</p> <p>First, the last couple of years our Fellowship of Christian Athletes have been permitted to take a school day to go through the C.O.P.E course at our local Boy Scout facility. It is a professionally run day course that is very close in nature and activities to the Outward Bound "low ropes, low impact" course. It teaches the same principles of team building, leadership, and innovative thinking for which the Outward Bound training is famous. This is certainly a good experience for our students who participate, but one that if we allow to continue, will consume over one half of the time allowed our school. One half our our allowable time would be consumed by the roughly fifty students we can send through the course per year.</p> <p>Another example is our Ski Club. Over the past couple of years, it has exposed many of our students to skiing by taking trips to Wisp for night skiing. It has also made a day trips to Snowshoe on weekends or holidays. These students have never traveled on instructional time. Some of the parents suggested that a Vermont ski trip be explored for next school year. The parents have offered to lead the fund raising to pay for about one half of the students' costs. The time selected would be over the Martin Luther King Holiday, so that three days of skiing could be provided while limiting time out of school to one day. (Our current county policy allows recreational clubs to be absent for one day instruction) Again, like the C.O.P.E. course, many of these students may never again have the opportunity to visit the New England area. Visiting a different part of our country and experiencing its somewhat different culture from our Mountain State has value for students, but again, would utilize one half of our school's time for extra-curricular events and trips. It is unfair for the thirty or forty students who would make the trip to take half of our school's time.</p>		

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	David Nuzum, Cont'd	<p>Most likely, these are the only trips our school would consider approving that are not WVSSAC sanctioned or co-curricular. I am sure we are not the only school that have one or two trips like these, that are clearly of value for the students participating, yet do not fall under a co-curricular "blanket". My concern is the cumulative fashion by which this time is allocated for the school. I would like to see the policy have a means for small groups such as ours listed above to be allowed to continue participating in high quality activities, that have value for the student, without totally expending the schools bank time. I believe trips such as these, that give students quality experiences that cannot be provided in a classroom setting, should be permitted outside the bank time. I do not believe these should include activities like "reward days" to a park. However, what effect will this provision have on "Principal Parties" and other rewards that have been the backbone for the WV mandated Responsible Students programs?</p>		
5/28/02	Eileen Poling, Tucker County	<p>It is ridiculous to include that 75% of the students be present to count the school day as an instructional day. We have no control over illness, the weather, or other circumstances that would affect attendance of our students.</p>		
5/28/02	Ben Cummings, Agriculture Teacher, Wirt County High School, Vice President, WV Assoc. of Ag. Educators	<p>The current version of policy 2510 out for comment through today has a couple of areas of concern that I would like to address.</p> <p>First of all the addition of civics as a requirement, beginning in 2005-2006, is another intrusion on elective programs. I realize that this is the politically correct move for the state board to make in wake of 9/11. However, if this requirement stands as policy it will have a negative impact on all elective programs.</p> <p>My guess is that this will remain a requirement regardless of the comments made about the policy. This seems evident since the Charleston Daily Mail has noted that the Dr. David Stewart, State Superintendent of Schools, is opposed to this proposal. I doubt that since the board went ahead with the decision to include civics, despite Dr. Stewart's comments, that my opinion will really matter much. Regardless, I have a suggestion that I would like to offer.</p> <p>If civics remains a requirement the state board should consider altering the fine art credit to one of a fine or applied art. This would lessen the impact on all technical programs. If the state continues to mandate additional classes to be taught there is going to have to be some compromise if technical programs are to survive. This compromise could allow the state board to add a requirement without destroying quality technical programs.</p> <p>My other concern is requiring all professional bound students to take two years of foreign language in the same concentration. This amounts to nothing more than another unfunded mandate for school systems. Many systems cannot afford additional state requirements without increases made in the state funding formula.</p> <p>I hope that these two suggestions are at least considered. Thank you for your time and attention to this matter.</p>		

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5/28/02	Mark Carl Fawcett	<p>I am submitting comments on Policy 2510 which is currently on review. I have tried to identify the section and page number (px) that my comments refer to in the comments.</p> <p>Section 3.1.1.a.E. (p2) It is not possible for many schools to increase their college going rate by 50%. My school (Magnolia HS) for example already has a 70-80% college going rate and it is not statistically possible to increase that to 105%. An increase in college going rate is not always what is needed anyway. Perhaps a minimum % should be set that is socially responsible. Not all students should go to college in any case.</p> <p>Section 5.49 (p12) I think Professional, Technical, and Entry would be better names for the Pathways. Skilled sounds pretty old-fashioned to me. I do agree however with the descriptions of the three levels.</p> <p>Section 5.59 9(p13) The paragraph contradicts itself when it allows the Beach Vocational Credit for entry or skilled level majors but on the next page, states that you must have the required third unit of science if you anticipate a two-year (skilled level) or four-year (professional) college. While we are here, we need to do away with CATS 9 and CATS 10. Nobody understands what the courses are and with 11 spaces in WVEIS to specify the course title, it is very confusing to employers and out-of-state colleges. Colleges want to see Science and Biology!</p> <p>Section 6.4.1.c (p17) I believe that a student that re-enters school after any amount of time out should have to complete the same graduation requirements he/she had when first enrolled. To do otherwise only stacks the deck against the re-enrolling student.</p> <p>Section 6.4.15 9 (p19) I believe that end-of-course exams might be of some use, but I do not believe they have proved sufficiently useful or fair enough to count for any part of a student's final grade at this point. There is too much variation from school to school and teacher to teacher to ever be able to fairly test all WV students with one end-of-course exam. Such high stakes testing has not proved useful in other states. It is much wiser to base student course grades on six week or nine week grades and a teacher made semester exam.</p> <p>Chart III I do not believe that sufficient teachers are available to teach required Foreign Language in middle school. I strongly disagree with forcing this on middle schools. In addition, requiring the same foreign language be taught in middle and high schools will cause tremendous problems when teachers at either level leave the school. There is no compelling reason to force middle school students to begin learning a foreign language.</p> <p>Chart IV (A) (p25) I do not agree that two of the three required math credits should be Algebra 1 and above. Many students do not need to know Geometry and in reality are not able to complete the necessary objectives. For college bound students, then Geometry and Algebra 2 are certainly recommended, but to require them for all students</p>		

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	Mark Carl Fawcett, Cont'd	<p>is not realistic. We only have one standard diploma, and it should reflect the completion of a minimum set of skills needed by ALL STUDENTS.</p> <p>Chart IV (B) (p27) For a moment imagine that you are an admissions counselor at Stanford University. You get a transcript from a high school in WV. It has the following courses listed on the transcript: CATS 9, CATS 10, 20/21 Cent, ENG LA 10, can you decipher what they mean? When you have 20 other applicants for the same seat with decipherable transcripts, do you bother to find out what those cryptic courses are? Take a close look at the "approved" WVEIS course abbreviations and tell me if they are clear to anyone outside the WVDE, or even to most people in WV public schools.</p> <p>Chart IV (B) (p28) We have one standard diploma. We should not have three sets of graduation requirements to get the same diploma. The students are not fools, they will simply all sign up as Entry Pathway students take the minimum courses plus the electives they want, and go on to college anyway. This is a nightmare for schools to check and enforce. Students will simply change their pathway when they have problems in a "required Professional" course, AND PARENTS WILL LET THEM!</p> <p>Chart V (p29) Advanced Biology, Advanced Chemistry, Advanced Physics and Advanced Environmental/Earth Science are not really advanced courses. How can you take an advanced course when your transcript does not show that you completed the regular course? It is untrue to call them "Advanced" courses when they are not.</p> <p>Chart V (p30) What about the 6th cluster -- Fine Arts and Humanities?</p> <p>Section 6.6 (p32) What about Technology Support Services. WVDE and the WV Legislature has poured many millions of dollars into computer hardware and software, but has not provided one dollare for manpower to implement, maintain, or repair that equipment. RESA's you say! Three technicians for 6 counties is a joke, even for Ohio county where they spend most of their time. We need manpower in each school!</p> <p>Section 7.2.12 (p38) Requiring 75% of an individual schools students to be in attendance in order for it to count as an instructional day is unfair. There are times when it is appropriate and desirable for students to attend school on a different schedule. A school for instance might have one day at the beginning of the school year for Freshmen student only as an orientation. It would be a real benefit to the incoming students and a reward for the upper classmen. When administering the SAT79, to grades 9-11, it would be much easier for the school and less distracting to the students being tested if Seniors are not in the building. Bells would not have to ring, and additional staff would be available to assist in the testing.</p> <p>Section 8.2.4 (p46) Certificates of Proficiency are an unnecessary paper work burden on the schools. In all the years they have been in place, I (a school counselor that handles</p>		

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	Mark Carl Fawcett, Cont'd	<p>most transcript requests for my school) have never had a single request from a parent, employer, or college for a copy of the Certificate of Proficiency. If this information is so important, then it should be included on the WVEIS transcript and printed automatically. To create a separate document which duplicates much of the information on the transcript is busy work.</p> <p>Section 8.2.5 (p46) West Virginia students are pretty normal. It is unrealistic to believe that all of them will ever get up to the 50th %ile on any nationally standardized test. To require those that cannot to continually have "skills improvement" programs is unfair and only turns them off further on school. They would be much better off spending their time taking electives to prepare them for entry into the work force. Parent conferences to place them in a skills remediation program is also unrealistic. It would only be another level of meetings to schedule, faculty to remove from their teaching duties, and extra work for principals and counselors that cannot get all their work done now.</p> <p>Bill, I realize my comments have been lengthy, but I have one more comment. Why are so many policies set for comment at the end of the school year? Do the members of the state board and the WVDE not realize that this is the busiest time of year for teachers, administrators and county office staff members. Could we not at least extend comment periods to some time AFTER school is dismissed? Is it really so much of a hurry that you could not accept comments until June 15th?</p>		
5/28/02	Phil Wyatt, WV Music Educators Association, President-elect	<p>Thanks for taking the time to read these comments. I hope you will forward them to the appropriate persons to be considered in modifying Policy 2510.</p> <p>Policy 2444.01 states that there is a graduation requirement of 1 unit for Applied Arts, Fine or Performing Arts, or Foreign Language. Policy 2510 graduation requirement is The Arts 1 course. It is my understanding that currently 2510 is in effect. But there is a conflict between these two policies, if indeed 2444.01 is in effect at all or is superceded by 2510</p>		
5/29/02	Kristal Roberson, Parent, Business & Computer Teacher	<p>As both a parent of a rising 5th grader and a computer teacher, I would like to recommend that Policy 2510 include a <u>requirement</u> for keyboarding and computer applications. (This would be a total of 1 ½ years).</p> <p>The suggested policy is as follows:</p> <p>Keyboarding taught to all students for one semester (daily) by a properly certified teacher for grades 5-8. This will ensure that students meet School to Work goals related to professional behavior in the work place. So many of the students develop improper keyboarding techniques and attitudes that do not meet School to Work goals.</p> <p>In 9th or 10th grade students should take a Business Computer Application course taught by a certified teacher. The teacher will follow the CSOs for this Course and ensure that all high school students have consistent and thorough instruction in MS Office or Corel</p>		

DATE	INDIVIDUAL/ ORGANIZATION	COMMENTS	ACTION/TYPE	RATIONALE
	Kristal Roberson, Cont'd	<p>Word processing, spreadsheets, databases, presentation software, and internet research basics.</p> <p>This policy ensures that all students have the capability of keying in their own reports for class work from the middle school level through grade 12. Also, they have the basic skills for spreadsheets, databases, and presentation software that they can use in entry-level jobs and for work-study positions in college offices when attending college.</p> <p>Unfortunately, schools are cutting their business educators at a time when funds and student populations are decreasing in some (but not all) areas of West Virginia. Also, the increased academic requirements in high school math, social studies, and the arts (drama or dance) are preventing the students from learning computer skills from certified and experienced computer teachers that are usually business teachers.</p> <p>As a parent and educator, I feel that as long as students can take music and art, drama and dance should be an elective that the school can, but does not have to offer (especially schools with less than 350 student enrollment). Computer education taught by a certified teacher should not be an elective but a requirement (for 1 ½ semesters).</p> <p>Lastly, certified business educators should also be able to teach Business Math and have it count as one of the four years of math credit. This will permit students who have difficulty with geometry, Algebra II, and trigonometry to take a course with practical requirements and have it count as math credit. (Yes, all students should be required to take through Algebra I. Most, but not all students, should take Applied Geometry).</p>		
5/28/02	Judy Alfrey, Stanaford Elementary	Please clarify for me Section 2510 that states that attendance must be 75% to constitute an "instructional day". 75% of our school, our county....? Also what happens if we don't have 75% attendance? Is there another day of school added as an "extra" day?		
5/28/02	Ron Wheelzel, Superintendent, Hardy County Schools	<p>126 -- 42 -- 3 Scope</p> <p>3.3 -- In the identification of system requirements the statement for art is incomplete.</p> <p>Recommendation: Revise statement to "develop an appreciation for and create and participate in the creative arts".</p> <p>126 -- 42 -- 7 Program Delivery</p> <p>7.2.12 -- The establishment of a percentage of student attendance at 75% is unworkable.</p> <p>➤ Over the past three years our county has been affected numerous times by circumstances resulting in the canceling of schools in one section of the county or the other. If this rule would have been in effect the result would have been keeping all students home, or returned from school to home during the school day. This would have been done in order for them to be made up later for the entire county. This would have used days that would have been reserved for snow-make up. The end result would have been less days of instruction overall.</p>		

DATE	INDIVIDUAL/ ORGANIZATION	COMMENTS	ACTION/TYPE	RATIONALE
	Ron Whetzel, Cont'd	<p>➤ There is no "magic" percentage that will work for every county.</p> <p>➤ Decisions to cancel school are not made lightly or without serious consideration.</p> <p>Recommendation: Records should be maintained by each county as to the days of attendance by county and individual school. These may be reviewed by OEPA to determine if abuses exist. Decisions to cancel classes, at a school or as a county, are local decisions. Abuses may be dealt with by the appropriate regulatory agencies. <u>The outcome measure of "average daily attendance" could be used as the standard.</u></p> <p>Chart IV (B) – the additional requirement of CIVICS is certainly commendable. However the following areas must be addressed:</p> <ul style="list-style-type: none"> ➤ Reduction of electives – tremendous problems already exist in providing students sufficient time to address the requirements of the career plans, vocational technical programming, fine arts requirements, etc... that have already been added. This will be the 4th new requirement (in the last three years). ➤ There has been no reduction in expectations in any other area to balance out new requirements. ➤ There are no teachers currently available to address this class. At a minimum the cost will include a teacher, space, equipment, and instructional materials – none of which are available in our system. ➤ This is clearly a cost item – yet not reflected in the fiscal note. <p>Recommendation: When the Learning Outcomes for Civics are developed they are to be incorporated by the individual counties into social studies classes already required. Decisions to the best means to incorporate instruction into existing classes, at a school or as a county, are local decisions. Abuses may be dealt with by the appropriate regulatory agencies. <u>The "outcome measure" of achievement on the End-of-course test (which would include civics questions) would be used as the standard.</u></p> <p>7.3g: The informal assessment requirements have resulted in a tremendous burden on local districts.</p> <ul style="list-style-type: none"> ➤ The assessment requires training for staff (this is compounded by: numerous other new requirements for training; no reduction in previous requirements were made; no increase in available time for continuing education; and the requirement that non-instructional days be available for conversion into instructional days). ➤ This will mean additional cost to compensate teachers in order to have them available for training. ➤ The time for administration of these extensive series of individual assessments will certainly impact instruction. ➤ Cost for preparing the assessment instruments are to be absorbed by the county. 		

DATE	INDIVIDUAL/ ORGANIZATION	COMMENTS	ACTION/TYPE	RATIONALE
	Ron Whetzel, Cont'd	<p>There is no fiscal note attached.</p> <p>Recommendation: Cost for training and materials should be addressed in the state funding assessments.</p> <p>126 - 42 - 8 Program Accountability</p> <p>8.2.5: The requirement that parents "must be involved" is vague. Remedial/reteach programs are already in effect for students.</p> <ul style="list-style-type: none"> ➤ What is the result if parents do not attend the conference? ➤ When are these conferences to be scheduled? ➤ May a parent refuse enrollment? ➤ What consequences exist if a student is not enrolled? ➤ There is no fiscal note for such a program. ➤ If this is an additional class then there are not personnel, space, equipment or materials available. ➤ If this is a separate class it now becomes, potentially, a four-year/four credit requirement further impacting the previous effects of increased requirements. We are now at the point where students have no elective choices remaining. ➤ This would require approximately 47,000 parent conferences to be held at the beginning of each school year. <p>Recommendation: Decisions regarding the organization and delivery of skill improvement programs are local decisions. Abuses or failure to deliver programs may be dealt with by the appropriate regulatory agencies. <u>The outcome measure would be that students show improvement in percentile scores.</u></p>		
5/30/02	Dr. J. Michael Mullen, Chancellor, Higher Education Policy Commission	<p>I offer the following comments on Policy 2510, Assuring the Quality of Education: Regulations for Education Programs.</p> <p>At its meeting on April 19, 2002, the West Virginia Higher Education Policy Commission took a bold step to increase the standards for undergraduate admission requirements.</p> <p>Series 23, Standards for Undergraduate Admissions of the West Virginia Higher Education Policy Commission establishes standards and procedures for undergraduate institutional admissions policies. The major change is to implement new baccalaureate admissions standards beginning with the 2007 fall semester. The high school unit requirements for regular baccalaureate admissions would increase to 4 in mathematics and 3 in lab sciences (effectively 4 units since Coordinated and Thematic Science I and II combined continue to count as one lab science unit). Additionally, a specified number of units would be required for the first time in foreign language (2), Arts (1) and Communications/Computer Applications (1).</p>		

DATE	INDIVIDUAL/ ORGANIZATION	COMMENTS	ACTION/TYPE	RATIONALE
	Dr. J. Michael Mullen, Cont'd	<p>We understand that computer applications have been incorporated into the content courses and will be validated by competency examination. If this is true, we will eliminate this requirement when final action is taken on the rule.</p> <p>The standards proposed in <i>Policy 2510, Assuring the Quality of Education: Regulations for Education Programs</i>, are not totally in sync with the standards established for higher education. In order for these improvements to work, I offer several points on behalf of the Higher Education Policy Commission:</p> <ol style="list-style-type: none"> 1. The Higher Education Policy Commission believes that these two policies need to be well coordinated between the Commission and the Board of Education. The policies should be coordinated to ensure a quality education for West Virginia's students. Is it possible to agree on implementation for entering high school freshmen of fall 2004, who will be the entering collegiate freshman of 2008? 2. The Higher Education Policy Commission offers to reduce the stress on the smaller county school districts through an agreement in which the community and technical colleges and/or four-year institutions would offer the newly required courses. The courses would be offered in-person or through electronic delivery. 3. Rather than requiring the implementation of all courses with the entering freshman class, the pressures on schools systems would appear to be reduced if course requirements were phased in over the four years. 4. Undergraduate courses are used to establish certification of content areas but not recognized for salary placement purposes. Legislative action permitted the use of such courses for support personnel. Would it be possible to allow teachers to use content courses, especially in shortage areas, to qualify for certification, re-certification, and salary placement? 5. Is there interest in a cooperative program between the Department, West Virginia University and the College Board to expand opportunities for teachers of Advanced Placement courses? <p>The Higher Education Policy Commission has the means to prepare teachers in order to teach the advanced curriculum. However, this will require the close cooperation of our offices to make it a reality.</p> <p>The Policy Commission stands ready to assist the Board of Education to succeed in this bold endeavor. Please contact me at 558-0699 to discuss further.</p>		

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Friday, April 05, 2002 12:37 PM
To: Pam Bird
Subject: FW: State School Board Policy 2510

Put with new comment log for 2510; note date it was received.

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: Ralph J. Cunningham [mailto:lkgas@wirefire.com]
Sent: Sunday, March 03, 2002 4:58 PM
To: William J. Luff
Cc: William J. Luff
Subject: State School Board Policy 2510

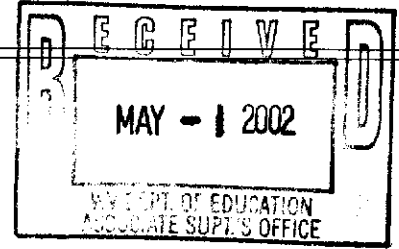
Dear Mr. Luff, I would like to take the opportunity to address the section 6.7.3 portion of Policy 2510 proposed changes. Please note, I serve as School Board Member in Calhoun County and while I can support many of the changes in the revised Policy I have to question of the total exclusion of Extra Curricular Activities during the regular School day. The Schools in Calhoun are required to keep to a minimum the number of Events to occur during the regular school day. Occasionally it is necessary to leave a little early to arrive on time for scheduled events and once in a very small while there is an event scheduled for the Student Body. So understand we do keep it to a minimum. In the coarse of Scheduling these events and given the long travel time from school to school in some cases some Schools would be limited to few opponents within a reasonable travel time. In our situation We have no Lights for our Baseball or Softball Fields an early on in the Season we could not complete Games before dark. Also would Teams participating in State Tournaments be held to the same restrictions? As with the recent State Wrestling Tourney it would be necessary to Wrestle Saturday and Sunday then travel Home and return the following week end to complete the Tourney, does that make sense?

It has been stated in some of the Annual School Board training that the Extra-Curricular Activities offered in our Schools are the single most effective Drop out prevention Tool available to the Children in Schools to day. One of the biggest reasons is that these Children are required to maintain a C average in their class work. They know they have to work harder than the regular Student body to keep their Grades up. To limit these programs may only add to the problem of keeping as many Children as possible in the Programs. There needs to be some leeway in the Policy for these matters not just a Black and White solution.

As I have found, in making local Board Policy, the only bad policy is the one you are not willing to make adjustments to once you find a flaw and it is much easier to correct a problem before it becomes one.

Thank you for your time, Sincerely.....

Ralph I. Cunningham
Calhoun County School Board
email: lkgas@wirefire.com



**HOUSE OF DELEGATES
WEST VIRGINIA LEGISLATURE**

BUILDING 1, ROOM 217-E
1900 KANAWHA BLVD., EAST
CHARLESTON, WV 25305-0470
PHONE (304) 340-3163

STANLEY E. SHAVER
R#1 BOX 47B
TUNNELTON, WV 26444
PHONE: (304) 568-2696
EMAIL: Turkeyman@labs.net

April 28, 2002

Committees:
Education
Agriculture & Natural
Resources
Political Subdivisions

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Building 6, Room 360, Capitol Complex
1900 Kanawha Boulevard East
Charleston, West Virginia 25305

Dear Dr. Luff,

I have a proposed addition to POLICY 2510 that I think should be included under 7.4 Personnel.

7.4.3 Deals directly with Principals. It reads as follows: 7.4.3 "Principals shall be provided professional development opportunities through a variety of means such as the principals' academy, institutes, workshops, conferences, teacher and business exchange programs, and school site visitations." I would like to see added to this list the following so the paragraph would read:

7.4.3 Principals shall be provided professional development opportunities through a variety of means such as the principals' academy, institutes, workshops, conferences, being a member of the state legislature (if elected or appointed), teacher and business exchange programs, and school site visitations."

As a member of the current House of Delegates Education Committee I know of no other institute, workshop, conference, etc. that can give a principal the knowledge and insight of the "Big Picture" of Education that the legislature can. I am inclined to think that you would agree with this since we have worked together. This is a statement of vision for the future and should be considered.

Sincerely,

Stanley E. Shaver, Principal
Fellowsville Elementary School

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Friday, May 03, 2002 10:55 AM
To: Pam Bird
Subject: FW: Comment on Section 5.39 and 7.2.12 Instructional Day

Please start new comment log on Policy 2510. I'll want copy each Thursday (beginning next week) for mailing to the St Bd. Thanks.

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: William Smith [mailto:wsmith@access.k12.wv.us]
Sent: Friday, May 03, 2002 10:39 AM
To: wluff@access.k12.wv.us
Cc: David Roach
Subject: Comment on Section 5.39 and 7.2.12 Instructional Day

The 75% per school attendance requirement would trigger a makeup day in the calendar. The logistical difficulties of having part of the system open while the others are off would be an undue burden on the school system. Bus drivers, cooks, maintenance staff, and professional faculty, etc. would view this as "inequitable" making it difficult to staff the effected school or schools on the makeup day.

I understand the intent is to encourage districts to carefully consider the placement of faculty senate days as well as attendance rates; however, that incentive is already in place in policy 2320.

William A. Smith, Assistant Superintendent
Cabell County Schools
2850 5th Avenue
Huntington, WV 25702
(304)528-5203

**POLICY 2510
SERIES 42
ASSURING THE QUALITY OF EDUCATION: REGULATIONS FOR
EDUCATION PROGRAMS
COMMENT RESPONSE FORM**

Comment Period Ends: May 25, 2002

Please use this form when commenting on proposed Policy 2510. You may attach additional sheets if necessary.

Individual/Organization: Nancy C. Kilmon, Berkeley County Schools

Title: Director, Research and Technology

Street Address: 901 S. Queen St.

City/State/Zip Code: Martinsburg, WV 25401

§126-42-1. General

§126-42-2. Purpose

§126-42-3. Scope

§126-42-4. General Responsibilities

§126-42-5. Glossary

§126-42-6. Program Definition

1. On page 27, the Chart IV(B) cites 16 credits after the words Core Requirements. Should that be 17 credits?
2. I would like to be sure that we understand the effective date of the changes in graduation requirements. The first group of graduates that must have civics is the Class of 2009, correct?
3. To further clarify the changes wrought by Chart IV(B), the number of electives is reduced by one and the number of core requirements is increased by one, that is, the addition of civics as a required credit. Correct?

§126-42-7. Program Delivery

Among the "Major Changes" list in the Executive Summary, #17 refers to section 7.2.10.v, which is not there. Is a section missing or is the reference incorrect?

POLICY 2510
SERIES 42
ASSURING THE QUALITY OF EDUCATION: REGULATIONS FOR
EDUCATION PROGRAMS
COMMENT RESPONSE FORM

§126-42-8. Program Accountability

8.2.6.b.C(b) Assessment of Plan

1. This section specifies an effective date of July 1, 2003. Clarification is requested. Is the initial assessment form completed by Graduates of the Class of 2003 at the end of their first year as graduates (Spring 2004)? Or, do the graduates of the Class of 2004 during Spring 2005 complete the first assessment form?
2. This same section specifies that the graduate would complete the assessment form at the "end of the first year following graduation."
 - a. The WV Higher Education Policy Commission requests follow-up data on our graduates by the end of March of their first year after having been graduated. Will the Higher Education request remain separate from the assessment specified in this section? In other words, would there be two follow-up efforts involving each class of graduates or will they be combined?
 - b. If the assessment form is to meet Higher Education's needs as well as certain legislative concerns, does the completion date in this section have to be reconciled with that required by Higher Education?
 - c. Will WVDE design and provide the assessment forms?
 - d. Will the information from the assessment form be reported to WVDE in any form?

§126-42-9. Alternate Delivery Systems

We note that the fiscal note page that accompanied the version we reviewed had no costs attributed to the changes. Certainly the addition of civics as a core requirement will have an impact on personnel. Has this additional cost been noted somewhere?

Please return comments to:

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Building 6, Room 360, Capitol Complex
1900 Kanawha Boulevard East
Charleston, West Virginia 25305-0330
Fax Number: (304) 558-0048

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Thursday, May 09, 2002 3:39 PM
To: Pam Bird
Subject: FW: Policy 2510 sections 5.39 and 7.2.12

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: linda adkins [mailto:chewie_25705@yahoo.com]
Sent: Thursday, May 09, 2002 11:00 AM
To: wluff@access.k12.wv.us
Cc: chewie_25705@yahoo.com
Subject: Policy 2510 sections 5.39 and 7.2.12

I am a teacher at Barboursville Middle School in Cabell County. My name is Linda L. Adkins. I started my 37th year on 2-02-02. The proposed 75% rule is the most ridiculous idea that has come from the state in my entire career.

1. You are aware that this will punish those students who were in school by making them go extra days-beyond the 180 required by state law? How do you think parents will react to this?

2. OSE days were given several years ago instead of a pay raise. Then we began trading OSE days to make up bad weather days. Okay, that was an unplanned day off for a planned day off. NOW you really believe that teachers, bus drivers, cooks, custodians and supervisory personnel will work an additional day-working 2 days, the day that less than 75% of the students were present and the scheduled OSE day. I think not!

OR is it planned that those students and staff in a school with less than 75% in attendance will go home on that day in order to keep within the 180 day school year?

3. How does this relate to the legislature passing the new attendance rule? My understanding is that students with severe attendance problems are no longer to be counted against the county/school ADA. Does this not make the proposed ruling about 75% go against state law?

- * 4. How will this handle -epidemics(flu for example)when a county board of health orders the closing of a school--floods, or does the wvde have a guarantee tht no more floods will occur--heavy snowfall, that force school systems to close for several days, or is that no longer to happen in WV.

I have surveyed my 7th grade students- they all respond when I explain this to them that this is a PUNISHMENT and several a suggested that their parents(lawyers) will fight this if adopted.

Linda L.Adkins

Social Studies 7th Grade

Barboursville Middle School

Barboursville, Wv 25504

Do You Yahoo!?

Yahoo! Shopping - Mother's Day is May 12th!

<http://shopping.yahoo.com>

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Friday, May 10, 2002 2:41 PM
To: Pam Bird
Subject: FW: Comment on 2510

Please use this one rather than the one with the typo.

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

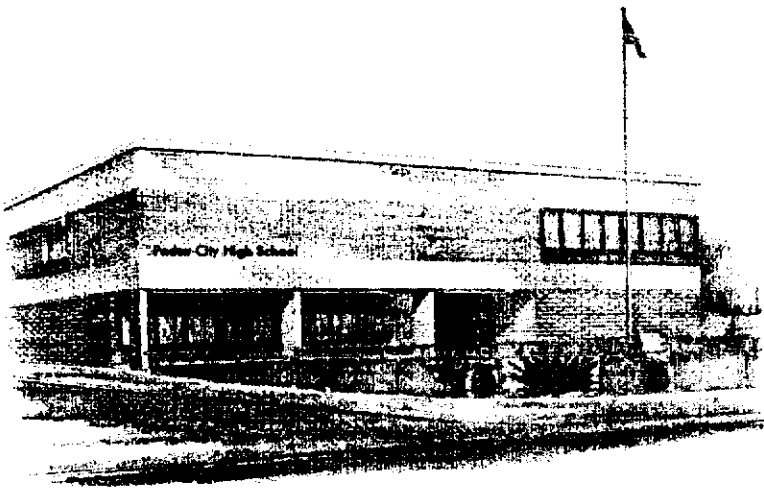
From: Bob Eggleton [mailto:Bob.Eggleton@wvculture.org]
Sent: Friday, May 10, 2002 2:10 PM
To: 'wluff@access.k12.wv.us'
Subject: FW: Comment on 2510

typo corrected

> -----Original Message-----

> **From:** Bob Eggleton
> **Sent:** Friday, May 10, 2002 10:19 AM
> **To:** 'wluff@access.k12.wv.us'
> **Cc:** Nancy Herholdt; Susan Yoho
> **Subject:** Comment on 2510
>
> Title 126, Legislative Rule, Board of Education, Series 42, Assuring the
> Quality of Education: Regulations for Education Programs (2510) §126-42-1.
>
> 7.3.1.q "...Examples of co-curricular activities include: band and
> choral presentations; theater productions; science or social studies
> fairs; mathematics field days; career / technical student organizations'
> activities; tours of historic sites or museums;...."
>
> **Rationale:** Clarification of the policy is needed to ensure that students
> continue to benefit from educational programming delivered by the Division
> of Culture and History, including guided tours of the State Capitol and
> the State Museum. The Division would prefer that it be specifically
> mentioned in the policy as follows, but the above clarification would
> likely provide sufficient discretion to county boards.
>
> 7.3.1.q "...Examples of co-curricular activities include: band and
> choral presentations; theater productions; science or social studies
> fairs; mathematics field days; career / technical student organizations'
> activities; tours of historic sites or museums or educational programs
> delivered by the Division of Culture and History;...."

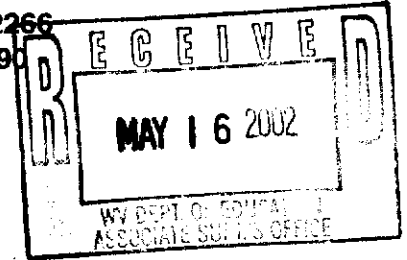
- >
- > Thank you for your consideration.
- >
- > Robert Eggleton
- > Director of Administration
- > West Virginia Division of Culture and History
- > 558-0220, extension 122
- >



Paden City High School

201 North Fourth Avenue
Paden City, West Virginia 26159

Office (304) 337-2266
FAX (304) 337-2290



May 16, 2002

Mr. William J. Luff
Deputy State Superintendent of Schools
West Virginia Department of Education
Building 5, Room 350, Capitol Complex
1900 Kanawha Boulevard East
Charleston, West Virginia 25305-0330

Dear Mr. Luff,

Policy 2510, as you well know, is out for public comment until May 25, 2002. There are several different provisions that I take exception to and I would like to officially object to the following provisions of Policy 2510:

5.39 as defined by Policy 4110 that the percentage of students that must be in attendance in order for a day to be considered an "instructional day" has been specified at 75%. The question was whether that would be by school or county. The State Department has stated it is by **school**.

Comment: Secondary schools in West Virginia are being pulled and pushed in many different directions simultaneously. How are we supposed to address workplace learning activities without having substantial numbers of students out of the building? There are many other very worthwhile activities that will be eliminated by this portion of the policy. There have been events that have forced individual schools to send students home for the day. What happens to a school that has one or more instructional days less than the rest of the county school system? It seems to me that the persons proposing these policy changes are very disconnected from secondary school instruction in West Virginia.

On Chart III of the middle school program of study, Foreign Language is added at the middle school level. Is nobody aware of the fact that there is a **SEVERE SHORTAGE OF FOREIGN LANGUAGE TEACHERS????** (Note: Can anybody explain why the West Virginia Board of Education and the West Virginia Department of Education are **ADDING** curricular requirements at a time of declining enrollment and **REDUCTION OF SCHOOL TEACHING PERSONNEL????**)

PLEASE do NOT approve Policy 2510, or Policy 4373, Student Code of Conduct, or Policy 4110, State Attendance Policy, until Building Level Principals and Assistant Principals and teachers can have a reasonable amount of time to register the **MANY, MANY** objections to all three of these policies.

Sincerely,

Warren Lee Grace, Jr.
Principal
Paden City High School

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Friday, May 17, 2002 9:43 AM
To: Pam Bird
Subject: FW: 2510

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: Lyn Guy [mailto:lgguy@access.k12.wv.us]
Sent: Thursday, May 16, 2002 12:19 PM
To: wluff@access.k12.wv.us
Subject: 2510

The stipulation that 75% of students must be present on a given day to have the day counted as an instructional process must have a waiver process in place to deal with individual school closures.

A case in point would be the closure of Mountain View School due to heat, water, or sewage...with 720 students in that population, Monroe County would only have 65% attendance on that day. To require the other schools to make up a day they actually attended would mean that we should close the county down when there is a problem in one school...

Dr. Lyn Guy
Superintendent
Monroe County Schools

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Friday, May 17, 2002 9:42 AM
To: Pam Bird
Subject: FW: Policy 2510

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: Hazel Bowen [mailto:hbowen@access.k12.wv.us]
Sent: Thursday, May 16, 2002 2:13 PM
To: wluff@access.k12.wv.us
Subject: Policy 2510

The proposed changes in Sect.5.39 and 7.2.12 of Policy 2510 are not equitable. Because I teach in a school where flood waters often loom nearby, I can easily visualize the day where the faculty and staff have arrived to work but high water has kept the buses from running and the children at home. This year there were several days where attendance was below 75%, but we were here ready to teach and taught to those present. I think that your "legal leg" regarding this proposed change would be a bit wobbly. If staff shows up, staff should be paid. If the staff has reported for the correct number of contractual days, no more can be legally added by policy alone.
Please keep these issues in mind when considering this change.

Marilyn M. Murdock
Cabell County

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Friday, May 17, 2002 12:35 PM
To: Pam Bird
Subject: FW: Policy 2510 comment

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: Jean Biggs [mailto:biggsww@hotmail.com]
Sent: Friday, May 17, 2002 11:41 AM
To: wluff@access.k12.wv.us
Subject: Policy 2510 comment

Dear Mr. Luff,
I don't think the staff of a school should be penalized because of a student or parent's responsibility re: school attendance, especially on the Faculty Senate days. The Legislature made the change to 1/2 day and knew there would be a problem with this as it was several years ago when Faculty Senate days were half-days.
Jean Biggs
Central City Elementary
Cabell County

Get your FREE download of MSN Explorer at <http://explorer.msn.com/intl.asp>.

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Friday, May 17, 2002 4:15 PM
To: Pam Bird
Subject: FW: Policy 2510

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: Donna Griffith [mailto:dngriffi@access.k12.wv.us]
Sent: Friday, May 17, 2002 3:53 PM
To: wluff@access.k12.wv.us
Subject: Policy 2510

I am not in favor of this policy (2510) that will require 75% attendance to be an instructional day. Our school (Central City Elementary, Huntington) works very hard to keep attendance up to an acceptable level. We have made strides in the four years that our school has been open, but we still have problems with no parent transportation if children miss the bus, no child care for half-days, and parents that still have no real value of education to realize that attendance IS important! I predict that we are going to have a problem on these new faculty senate release days. I do not think that we should be punished for situations that are not in our control. I also feel that the children who do attend are being treated unfairly if their school attendance does not count on a "less than 75%" day. I hope that the policy makers will take some time to really think about what this requirement means to most schools in WV.

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Friday, May 17, 2002 11:31 AM
To: Pam Bird
Subject: FW: comments on 2510

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: Dan Curry [mailto:ddcurry@access.k12.wv.us]
Sent: Friday, May 17, 2002 10:59 AM
To: wluff@access.k12.wv.us
Subject: comments on 2510

I'll make one final suggestion for 2510. If we must teach civics to all, I believe we should save it for the senior year and shape it to more practical uses. We recently completed a survey of Wood County Graduates from the last four years who attend WVU. We found that most felt prepared academically, but they struggled with managing their time, study skills and managing their money.

There are two things that 99% of our graduates will be – parents and citizens. I think the civics class should be designed as a citizenship class. We as educators complain about the impact of poor parenting all the time, yet formal instruction of it takes place only for those who choose it as an elective course. The college educated do not automatically become good parents. The class should have a unit on civics, but also should address parenting and personal finances. I think it some units could vary for professional, technical and skilled students. I believe our teachers can do some things to help our college bound students improve their study skills, but the time management and money management issues could be part of the citizenship class.

I'm sure you can't wait to finish up 2510. We're ready as well.

Daniel D. Curry, Superintendent

Wood County Schools

1210 13th Street

Parkersburg, WV 26101

304-420-9670x125

<<Dan Curry (Dan Curry).vcf>>

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Tuesday, May 21, 2002 7:54 AM
To: Pam Bird
Subject: FW: Comments on Policy

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: MMiller345@aol.com [mailto:MMiller345@aol.com]
Sent: Monday, May 20, 2002 11:48 AM
To: wluff@access.k12.wv.us
Subject: Comments on Policy

Mr. Luff and Members of the West Virginia Board of Education,

I am commenting on the new graduation requirement for one credit of Civics. Kanawha County has been requiring one half credit of civics and one half credit of economics for the past two years. This has been a very effective and powerful requirement for students. Recent studies published in the newspaper have indicated that American students know very little in each of these areas and we would like to continue our program with some revisions to our objectives. These revisions may include more expectations for participation in civics and a stronger emphasis on financial literacy in economics. We ask that you consider requiring one half credit of Civics and one half credit of Economics for high school graduation.

Yours truly,
Margaret Miller, Curriculum Specialist for Social Studies, Kanawha County
Schools

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Tuesday, May 21, 2002 7:55 AM
To: Pam Bird
Subject: FW: Policy 2510

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: Steve Tennant [mailto:sttennan@access.k12.wv.us]
Sent: Monday, May 20, 2002 9:35 AM
To: wluff@access.k12.wv.us
Subject: Policy 2510

Dear Mr. Luff,

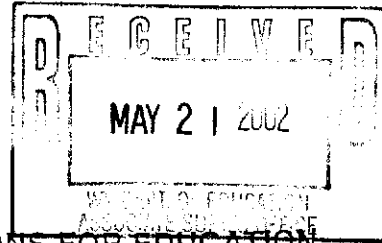
I am concerned with the current statements in Policy 2510 concerning adding more required classes for graduation. I truly believe that addition time should be spent on teaching civic and government, but that should be within the current CSO's for eight or ninth grade social studies, not an additional class to be required for graduation. The other concern I have is the potential requirement of two foreign languages for any student in the professional level. I am a college graduate with a masters degree in Agricultural Economics and have yet to take a foreign language class. I do not feel my inability to speak a foreign language has or will ever prevent me from being employed.

High school students should be able to gain a well rounded education without the restrictions of Clusters and Majors and especially without being forced to take classes in foreign languages.

I strongly encourage you and the State Board of Education to rethink the changes to current policy.

Sincerely

Steve Tennant



POLICY 2510
SERIES 42
ASSURING THE QUALITY OF EDUCATION: REGULATIONS FOR EDUCATION
PROGRAMS
COMMENT RESPONSE FORM

Comment Period Ends: May 25, 2002

Please use this form when commenting on proposed Policy 2510. You may attach additional sheets if necessary.

Individual/Organization: Sutton Elementary School
Title: Sp Ed Teacher
Street Address: N. Hill Rd.
City/State/Zip Code: Sutton WV 26644

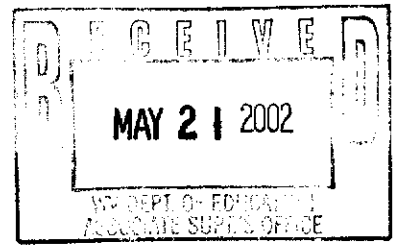
§126-42-5. Glossary

It is important to include teachers responsible for student achievement. I am not a member of the board and all members of the board should be included.

§126-42-7. Program Delivery

we are not doing what we should be doing. I am frustrated with the way the policy is written. It includes a lot of things that are not necessary. Please return comments to:

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Building 6, Room 360, Capitol Complex
1900 Kanawha Boulevard East
Charleston, West Virginia 25305-0330
Fax Number: (304) 558-0048



**POLICY 2510
SERIES 42
ASSURING THE QUALITY OF EDUCATION: REGULATIONS FOR EDUCATION
PROGRAMS
COMMENT RESPONSE FORM**

Comment Period Ends: May 25, 2002

Please use this form when commenting on proposed Policy 2510. You may attach additional sheets if necessary.

Individual/Organization: Blaine C. Hess Jackson County Schools
Title: Director of High Schools and Vocational Education
Street Address: # 1 School Street
City/State/Zip Code: Ripley, WV 25271

§126-42-1. General

§126-42-2. Purpose

§126-42-3. Scope

§126-42-4. General Responsibilities

§126-42-5. Glossary

- 5.39.1.1 The requirement that 75% of a school student's to be present in order for the day to be counted as an instruction day initially sounds like a reasonable requirement. However, upon further examination, it appears that this requirement could increase transportation costs without improving attendance.

The proposed policy states that the 75% attendance rate will be calculated on a school-by-school basis. In the event that only a few schools in the county did not meet the attendance rate on a given day, buses may be needed throughout the county for the make-up day. It is also very likely, particularly on the secondary level, that students that attended school on a day with less than 75% attendance might be reluctant to attend the make-day, with might cause yet another day of less than 75% attendance.

§126-42-6. Program Definition

- 6.4.13.1 As graduation requirements are increased, the opportunity for students to enroll in elective programs will decrease proportionally. The ability to enroll in elective courses will be impacted further if a student must repeat a given course during his/her high school education.

The latest addition to the requirements for graduation is a Civics course. This course, while a worthy subject, would be better suited as an elective course. The addition of another required course will necessitate additional staff or fewer elective offerings.

§126-42-7. Program Delivery

§126-42-8. Program Accountability

§126-42-9. Alternative Delivery Systems

Fiscal Note: It is noted within the revisions of Policy 2510 that the changes will not require any additional cost in order to implement. It is difficult to imagine that increased graduation requirements relating to mathematics, science, foreign language and civics will not require additional staff, which in turn will cost more money.

Please return comments to:

**William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Building 6, Room 360, Capitol Complex
1900 Kanawha Boulevard East
Charleston, West Virginia 25305-0330**

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Tuesday, May 21, 2002 12:20 PM
To: Pam Bird
Subject: FW: 2510 graduation requirements

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: CherylW70@aol.com [mailto:CherylW70@aol.com]
Sent: Tuesday, May 21, 2002 10:41 AM
To: wluff@access.k12.wv.us
Subject: 2510 graduation requirements

Dear Mr. Luff, I am a school counselor with more than 20 years in the profession and I am hoping that the new provision to require all professional pathway students to take foreign language is reconsidered. By doing this, we as a state are setting more stringent requirements than the colleges themselves as most medical, engineering, business, etc. degrees do not require foreign language. Our Programs of Study book which we developed at some length already addresses this issue and makes clear to students when foreign language is required. We also advise any student that wishes to keep all options open to take foreign language and all students are told to check out general admission requirements as well as program requirements at the school of choice. Why backtrack to a one size fits all program for our professional pathway students? This is further limiting student options and though well intentioned, cannot be considered progress. Cheryl Whitescarver
Counselor Grafton High School

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Tuesday, May 21, 2002 12:21 PM
To: Pam Bird
Subject: FW: Policy 2510

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: James Beatty [mailto:jbeatty56@hotmail.com]
Sent: Tuesday, May 21, 2002 8:18 AM
To: wluff@access.k12.wv.us
Subject: Policy 2510

Mr. Luff

Policy 2510 will add additional requirements to our students that they may not necessarily need. I feel the bill should encourage students to take foreign languages not require them. The same should be said for civics, should students really have to take 4 years of history or social studies? I feel that you will have more success with students if you strongly suggest they take foreign languages instead of making them mandatory. Mandatory foreign language will increase the number of students who do not graduate for lacking the requirements. Students who are in a technical area and do not plan on going to college should not have additional academic requirements that keep them from the classes which teach them the skills necessary to succeed in these chosen careers. So please do not add any more requirements to the students coming into high school and let them choose their pathway with the current class load requirements

Thank you

James Beatty

Chat with friends online, try MSN Messenger: <http://messenger.msn.com>

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Tuesday, May 21, 2002 3:14 PM
To: Pam Bird
Subject: FW: Policy 2510

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: Layle Lawrence [mailto:llawrenc@wvu.edu]
Sent: Tuesday, May 21, 2002 1:34 PM
To: wluff@access.k12.wv.us
Subject: Policy 2510

I would like to comment on proposed provisions of Policy 2510:

a. Given the shortages of competent teachers to offer foreign languages, the limitation of choices of foreign languages offered, and the limitation of county systems to employ and fund additional teachers, I would strongly encourage the Board to consider continuing the two credits of foreign language as a recommendation rather than a requirement for students in the professional career pathway.

b. It would seem prudent to infuse the study of civics into the existing required social studies courses. I believe some degree of freedom for students to select and take elective courses is essential for maintaining interest in school work through the high school years.

c. In the same light, I strongly encourage the modification of the current fine art requirement to be worded as a fine or applied art.

Sincerely,

Chair
Education
Layle D. Lawrence, Professor and
Agricultural and Environmental
West Virginia University

Layle D. Lawrence
Agricultural & Environmental Education
ph. (304) 293-4832 ext 4482
e-mail: llawrenc@wvu.edu

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Tuesday, May 21, 2002 4:39 PM
To: Pam Bird
Subject: FW: Policy 2510

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: Harry Boone [mailto:hnboone@wvu.edu]
Sent: Tuesday, May 21, 2002 3:24 PM
To: wluff@access.k12.wv.us
Subject: Policy 2510

I would like to comment on proposed provisions of Policy 2510.

1. I would strongly encourage the Board to consider continuing the two credits of foreign language as a recommendation rather than a requirement for students in the professional career pathway.
2. I urge the Board to explore ways the civics component can be infused into existing social studies requirements. If that is not possible, I encourage the Board to consider recommending rather than requiring the completion of a civics class as a requirement for graduation.

A recommendation provides guidance for all students. Most students, especially those preparing for a college education, will follow through with the recommendation(s). Students must be given some degree of freedom to select classes in order to maintain interest in school and their academic pursuits.

Harry N. Boone, Jr.
Agricultural and Environmental Education
The Davis College of Agriculture, Forestry, & Consumer Sciences
West Virginia University
Phone: 304-293-4832 ext. 4481
E-mail: hnboone@wvu.edu

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Wednesday, May 22, 2002 7:52 AM
To: Pam Bird
Subject: FW: Regarding 2510

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: Carol Boersema [mailto:cboersie@msn.com]
Sent: Tuesday, May 21, 2002 6:36 PM
To: wluff@access.k12.wv.us
Subject: Regarding 2510

Greetings Mr. Luff

I e-mailed you back in February about the 2510 policy. The way I read it then was field trips, extra curricular activities in the classrooms (such as crafts) would be eliminated during the school day. I'll have to admit I was not at all pleased and I wrote an unpleasant message criticizing the new rules. Your response was immediate and informative but still found it frustrating to know hardly anyone knew about the changes or the website. By the time I spread it through the school, it was too late to have a say in the matter. I see now it is extended till May 25. I will inform others about these revisions but the way I see it now, we can have field trips and other activities during the school day (Sec 7.2.14.c and 7.2.14.q). Is this using Bank Time only or may some instructional time be used for these subject-related crafts?

I am very pleased you have extended the deadline for comments to May 25. Thanks for your concern.

Sincerely
Carol Boersema

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Wednesday, May 22, 2002 10:15 AM
To: Pam Bird
Subject: FW: Policy 2510 comment

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: Ron Cantley [mailto:rbcantle@access.k12.wv.us]
Sent: Wednesday, May 22, 2002 8:55 AM
To: wluff@access.k12.wv.us; rbcantle@access.k12.wv.us
Subject: Policy 2510 comment

rbcantle@access.k12.wv.us Ron Cantley II 256-4616

The essence of what the policy is doing is great.

The pace and volume of change with this and other policies impairs comfort to an unhealthy degree. Change requires us to get out of our comfort zone, but this may be uncomfortable to an unhealthy and damaging degree. Efforts at reassurance and gradulization may be crucial.

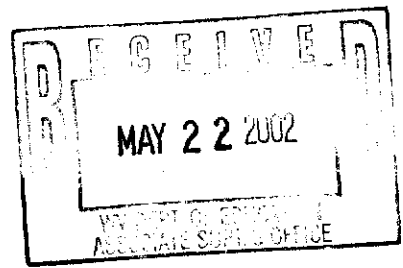
The community makes independent decisions about what days count and which days do not. On a few days, like state hoop tournaments, the community value system imposes less than 75% attendance. What if we show up and less than 75% of the pupils do? How will we make this up if our people meet their contractual obligations?

Will we be able to grade and return year ending exams in time?

Do extra tasks like year ending exams have hidden costs and have the potential to cost money and expand the bureaucracy?

If principals are the key to having a good school what have we done to strengthen their position? We have only increased accountability for administrators and consequences for them. We still have not let them pick their players, cut bad players, or implant their own game plan. Why is the principal the accountability focus when they do not have the tools we give to a high school football coach? Why do we have a disconnect between accountability and the classroom teacher? Teachers are smart people? This may be the essence of why we can not recruit new principals. They see us being accountable and responsible for results

when we do not have the tools that managers in every other profession view as essential and non-discretionary. The next frontier of educational improvement in West Virginia may be strengthening the role of the principal.



POLICY 2510
SERIES 42
ASSURING THE QUALITY OF EDUCATION: REGULATIONS FOR EDUCATION
PROGRAMS
COMMENT RESPONSE FORM

Comment Period Ends: May 25, 2002

Please use this form when commenting on proposed Policy 2510. You may attach additional sheets if necessary.

Individual/Organization: Claine J Wine - School Counselor
Title: Counselor
Street Address: 288 North Hill Rd
City/State/Zip Code: Sutton, W.V. 26627

§126-42-5. Glossary

§126-42-7. Program Delivery

I believe the policy to base the instructional day on a 75% minimum attendance is unfair to individuals and schools with good attendance. I don't think this policy will deter truancy or have any significant impact on attendance. It will only punish those who already strive for good attendance.

Please return comments to:

William J. Luff, Jr.

Deputy State Superintendent of Schools
West Virginia Department of Education
Building 6, Room 360, Capitol Complex
1900 Kanawha Boulevard East
Charleston, West Virginia 25305-0330
Fax Number: (304) 558-0048

Thank you,
Claine J Wine
School Counselor

A

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Wednesday, May 22, 2002 3:14 PM
To: Pam Bird
Subject: FW: POLICY 2510

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: Charlotte Hutchens [mailto:chutchens@access.k12.wv.us]
Sent: Wednesday, May 22, 2002 2:51 PM
To: wluff@access.k12.wv.us
Subject: POLICY 2510

Charlotte Hutchens
Raleigh County Schools
105 Adair St.
Beckley, WV

126-42-5 Glossary

The glossary is a good reference item. It helps clarify several concepts.

126-42-6

6.4.15 I still have concerns about the end-of-course exams. We must have assurance the exams will be scored and returned in a timely manner. The language of "no less than 15%" implies the exam could count for more. This

Category 7.2.12. Provide, at a minimum, an instructional day 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. A minimum of 75% of the school's students must be in attendance as defined by policy 4110 in order for the day to be counted as an instructional day.

Category 5.39. Instructional Day - Time allocated within the school day for the teaching and mastery of content standards and objectives. The minimum instructional day for K-4 is 315 minutes, 5-8 is 330 minutes, and 9-12 is 345 minutes. (See Sec. 7.2.12) A minimum of 75% of the school's students must be in attendance as defined by Policy 4110 in order for the day to be counted as an instructional day.

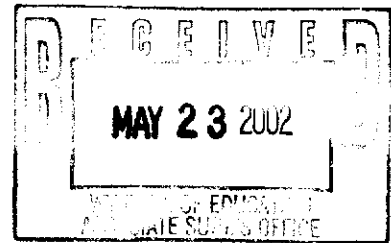
- a) schools within a county would have a different number of days
- b) teachers within county would be working a different number of days, some making up days, others not
- c) when would days be made up
- d) what would be implications for calendar
- e) If one school did not meet 75% requirement, would entire county have to make up day

7.2.14

- c) The idea of extra-curricular activities not accounting for more than 1% of instructional time is going to be extremely difficult to track. It will add to the paperwork burden.

May 20, 2002

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Bldg 6, Room 360, Capitol Complex
1900 Kanawha Boulevard East
Charleston, WV 25305-0330



RE: Comment on Policy 2510

Dear Mr. Luff:

I am very concerned about the changes in Policy 2510, and more specifically referencing item #4, to-wit: "The percentage of students that must be in attendance in order for a day to be considered an *instructional day* has been specified at 75% (Secs. 5.39 and 7.2.12). Rural schools do not have the privilege of an attendance director to phone each day when a child is absent. Teachers do the best they can during planning periods, however, do not always have the time to sit and make several phone calls regarding absenteeism.

This rule is unfair because it does not address the problem. There will be problem days such as days before and after holidays and breaks and whole school field trips (where parents choose not to let their children attend). Elementary school age children are more susceptible to the viruses and flues that cause extended absences. There are times when the weather causes students who attend rural schools to miss.

I disagree with this policy and would hope that careful consideration is given before any final decision is made. Thank you.

Respectfully,

Cynthia J. Robinson
Secretary
Sutton Elementary School
288 North Hill Road
Sutton, WV 26601
(304) 765-5202

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Friday, May 24, 2002 10:16 AM
To: Pam Bird
Subject: FW: Policy2510 Section7.2.12 and 5.39

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: Donald Elswick [mailto:ddelswick@charter.net]
Sent: Thursday, May 23, 2002 5:42 PM
To: wluff@access.k12.wv.us
Subject: Policy2510 Section7.2.12 and 5.39

Mr. Luff,

I am not pleased with the proposal of holding each individual school accountable for 75% attendance. It seems to be setting up an endless cycle of problems. Flooding, Snow/Ice, and the winter flu outbreaks affect each student differently. For example: Our neighborhood is not inhibited by flooding but several areas in our school district are. Should my kids, (who can always get to school), be forced to attend extra days simply because of limited bus runs??? If my child attends during a winter flu outbreak and the school dips below the 75% mark should they then be required to sit in school extra days in the summer?? I, for one, would not send them on the extra days if they had attended the "sub-75% days." Several parents feel the same way. So, what happens when the make-up days are poorly attended? Will they not count either??? Are we going to have rural schools going to school most of June because of bad weather or flooding while their city counterparts get out in May? This policy may look good on paper but it is terribly unrealistic and prejudiced.

Sincerely,
Stephanie Elswick

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Friday, May 24, 2002 12:52 PM
To: Pam Bird
Subject: FW: Policy 2510

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: S. Wolenski [mailto:swolensk@access.k12.wv.us]
Sent: Friday, May 24, 2002 11:44 AM
To: wluff@access.k12.wv.us
Subject: Policy 2510

Concerning Policy 2510

5.39. Instructional Day - Time allocated within the school day for the teaching and mastery of content standards and objectives. The minimum instructional day for K-4 is 315 minutes, 5-8 is 330 minutes, and 9-12 is 345 minutes. (See Sec. 7.2.12) A minimum of 75% of the school's students must be in attendance as defined by Policy 4110 in order for the day to be counted as an instructional day.

This is not practical for these reasons:

- 1.If the decision to not count a day as an instructional day is determined on a school by school basis, the bus connections in rural counties would be impossible.
2. How will we know the school's attendance until the day has begun? Do we send the students home if the % is not 75%? Do we close the entire county or just that 1 school? How would parents who would have to arrange for child care have time to make arrangements? Working parents need to know ahead of time in order to be sure their children are being properly supervised. Many elementary students would not know where to go if sent home early.
3. How would days be made up by staff that has reported for work?
4. How would days be made up if 1 school were closed? Only that school would make up the day or would the entire county have to attend? (see bus issue #1)
5. Would the end of year date be moved if the number of days to make up exceeds the available OS days?

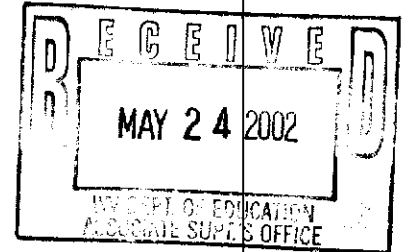
Please consider these concerns before passing Policy #2510.

Thank you,

Sandra Wolenski

FAX TO: (304) 558-0048

Wm. J Luff, Jr.



FROM: BECKY FAMA

STANAFORD ELEM.

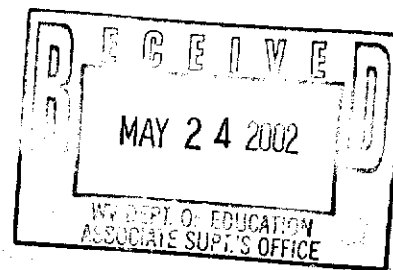
Please look at the section of 2510 which states that attendance must be 75% to constitute an "instructional day." What happens if we don't have 75% attendance?

Is this school-wide or per classroom? Do we add another day of school? Do students, teachers, bus drivers, cooks, etc. who attended have to come on the "extra" day.

~~How~~ How will you pay them?

I am a kindergarten teacher and it is not unusual for me to have 5-6 children absent in the winter due to illness or icy roads.

Becky Fama



Fax to: (304) 558-0048

Wm. J. Luff, Jr.

From: Letha Domingues

Stanaford Elem.

I have a real concern about ~~the~~ Section 2510 which states that attendance must be 75% to constitute an "instructional day." What happens if we don't have 75% attendance?

Is this school wide or individual classroom? How will this affect teachers, bus drivers, cooks, aids.

Are we paid extra for these days.

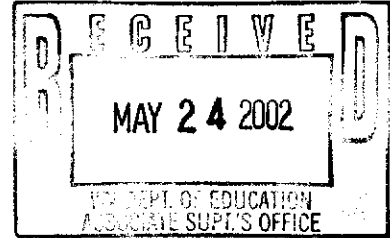
Litha Demeryus

Marion County Board Of Education
Marion County Vocational-Technical Division

Roger Perdue
Administrative Assistant

RR 1, Box 100-A
Farmington, WV 26571
304-986-3590
Fax 304-986-3440

FAX COVER SHEET



TO: William J. Luff, Jr.

FROM: Roger D. Perdue

DATE: 5/24/02

REFERENCE: Policy 2510 Response

This is the first of 5 pages.

Additional Comments:

**POLICY 2510
SERIES 42
ASSURING THE QUALITY OF EDUCATION: REGULATIONS FOR EDUCATION
PROGRAMS
COMMENT RESPONSE FORM**

Comment Period Ends: May 25, 2002

Please use this form when commenting on proposed Policy 2510. You may attach additional sheets if necessary.

Individual/Organization: Roger D. Perdue

Title: Administrative Assistant - Marion County Schools

Street Address: Rt. 1 Box 100 A

City/State/Zip Code: Farmington, WV 26571

§126-42-1. General

§126-42-2. Purpose

§126-42-3. Scope

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§126-42-3. Scope

§126-42-4. General Responsibilities

§126-42-5. Glossary

Career Major Unit needs defined in glossary.
 5.39 The requirement that a minimum of 75% of the school's students must be in attendance ... should be county's students - this would be more manageable.

5.49 Definition needs to be consistent with 8.2.6 & other references.

5.59 Exempt should be changed to waived or another appropriate word.

§126-42-6. Program Definition

5.67 suggestion that second sentence read "The minimal credit that may be awarded is one-half ($\frac{1}{2}$) unit."

5.26 Other articulated course(s)

§126-42-7. Program Delivery

methods should also be defined along with "dual credit" courses.

Koger V. Terdue - Marion County

Page 1

126-42-6 Program Definition

With the addition of Civics as a 4th. Social Studies Requirement, The Arts Credit should be opened to applied practical arts as well as fine arts.

Page 34 Should Foreign Language also have the *** qualifier for substitution

Page 35

The four concentration units ... must be consistent ... Does this mean a direct match or only a relevant consistency?

***** Language should be adjusted. "shall" is too restrictive. Who is going to pay for student credentials?

Under work-based learning suggest that language read "All students must participate in work based learning experiences ...". Remove "a" and making "experience" plural.

Page 36

Why all the "advanced" prefix? AP, ap, honors, etc is confusing enough. Science seems to be the only area with this concept.

Page 37

Again the "Arts" requirement should be more encompassing including applied practical arts.

Page 44

7.2.7 I am adamantly opposed to requiring a program area advisory council in each technical concentration. This is a laudable goal but not practical as a mandate. We have an exorbitant number of required committees as it is.

Page 55

7.4.1 Does this mean they must have attended the principal's academy or only be able to demonstrate requirements? This would severely limit administrative available pool to those in WV.

Page 59

D. This statement needs more definition. Does scheduling mean time or duty scheduling?

Page 60

7.6.5 "practical" instead of "practicable"

To: Wm. Luff, WVDE
Comments on SBI² 2510

From: Tom Deadrick, Marion County Schools

Comments on SBI² 2510 –

5.12: The name Career Majors is confusing to parents who want to equate this with a college "major." The wording should be something like Career Focus.

5.26: Is the 8100-minute issue applicable to dual credit courses? If high school credit is to be awarded, do they need to meet this minute requirement the same as required for other high school courses. If not, it should say so – but this then creates a double standard!

5.29: "Required" electives needs to be defined. This statement is vague. Parents often ask how we "require" electives!

5.49: The language used needs to be consistent. Section 8.2.6 refers to the plan as a "transition" plan not an "education" plan.

5.59: This language does not appear to meet the intent of this option. They really are not being exempt from a course as much as substituting a course in place of the required one.

5.67: Does the language of this section allow the awarding of ¼ credits?

5.68: Does the 8100 minutes apply here? Again, if not, you are creating a double standard where this applies to some courses and not others.

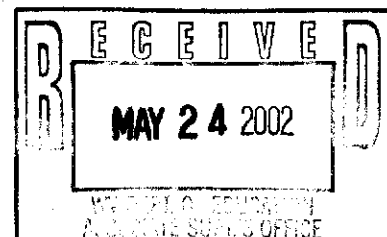
6.4.6: Does this section allow us to award credit for dual credit, college courses and/or virtual school courses? It specifically talks about tested/demonstrated masters associated with ... 8100 minutes of instruction time. These other situations will possibly not have 8100 minutes scheduled!

6.4.12: Again, does the 8100 minutes apply here?

Footnote ** on Chart IV (A): The word "exempt" is not accurate since they are taking another course in lieu of the required one.

Chart IV(B) – Career Major Credits table: This whole idea defeats the concept of Career Majors and Career Clusters whereby students are taking courses in their identified area of interest that will give them an idea of the field. (e.g. a student in the Business Cluster taking an accounting course, etc.)

This becomes another unfunded mandate when you are adding additional math and science courses to a majority of students. A majority of students do in fact select the professional path. Additional teachers will be required to offer these!



To: Wm. Luff, WVDE
Comments on SBP 2510

From: Tom Deadrick, Marion County Schools

Do WV colleges require 2 years of foreign language? If not, why is it required here?

This chart does not indicate that the additional math and science must be of a higher level than that previously taken. Without this language, students will figure out that they can take something lower than they already had and still meet this new requirement!

It would seem more appropriate to perhaps require a computer type course if you are looking at a way to circumvent the courses already selected at the local level to fulfill this need. Our county followed the state model for courses related to clusters and majors, with tweaks to meet local needs, and now this appears to say that this is not correct or acceptable.

The allowance to substitute courses does not indicate that they are relevant to their chosen program of study (cluster and major).

If the state is going to select the generic courses with a one size fits all for this, then why continue with the clusters and majors.

This is very frustrating to us on the local level who fought hard battles to implement the policy and Senate Bill 300. What they say is really true – just wait and the state will change their mind and this too will go away! This newest proposal verifies this.

Chart on Work-Based Learning: The wording has "a" work-based learning experience as though one small job shadowing would satisfy this. The wording should be in "work-based experiences."

Footnote * on Chart IV (B): This is not possible for all students. What about the student that fails Applied Math I and must repeat it his 10th grade year? He cannot do this! What about the student that takes Alg-Geo Prep in grade 9 and Applied Math I in grade 10? He does not meet this.

Chart V: Why are the science courses called "advanced?" Isn't Biology just Biology? We don't name it Advanced Geometry so why the Advanced Environmental Science, for example? Why isn't it Advanced Human Anatomy?

7.2.7: Having an advisory council for each technical concentration is overkill! This causes way too many committees for a school to handle.

7.2.13: Part of this statement allows vocational centers to have a different standard that other schools in not requiring 8100 minutes of instructional time just because of travel time. This creates a double standard under which we are operating. At one time we say students must be scheduled for 8100 minutes and

To: Wm. Luff, WVDE
Comments on SBP 2510

From: Tom Deadrick, Marion County Schools

then say that as long as they can show mastery, then the course can be less than 8100 minutes. Which standard are we using? The option that had been presented earlier in reducing their elective requirements due to travel time would work the best since it does not create a double standard with the issue of 8100 minutes!

7.3.1 (q): Instead of "band" presentation it should read "music" since band is covered by SSAC rules as mentioned in the previous section that defines the use of bank time. Why is band treated differently?

7.4.1: Does this say that all supervisory/administrative staff employed in the Central Office must have administrative certification and have attended the principals' academy? Only principals are invited to the principals' academy and it is not open to others! Do curriculum supervisors require an administrative certification? This standard makes no sense!

7.4.1 (c): Why is classroom hyphenated?

8.2.4 (after l): Why is "college credits earned" bulleted?

8.2.4: How is this to be accomplished? There is not a common database from which to pull all of this information. This is not something that WVEIS does. Has this been fully thought out as to how to do this?

8.2.5: This appears to only be applicable to 9th grade students since students in grades 9 and above do not take a standardized test to give the data required for this standard. All students in 9 through 12 take end-of-course exams.

8.2.6 (b) (A): When does the student select a pathway? A previous chart relies on the selection of a pathway for taking additional math, science or technical concentrations but where do they indicate their chosen pathway?

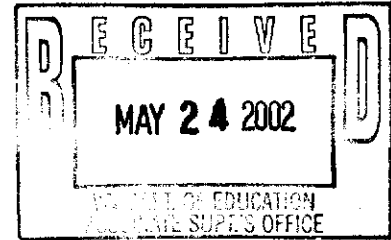
The concept of selecting a major is worthless since a previous graduation requirement chart refers only to pathways. Why go through the needless process for professional path students when it is meaningless?

8.2.6 (b) (B) (d) (C): The title has capital letters that I believe refers to the College Board's Advanced Placement program. When in lower case I understand it refers to honors and advanced courses. The definition here differs from that given in the glossary at 5.36. Does the 8.2.6 ... refer to just the College Board program? If so, the advanced satellite or Internet courses are not applicable. Also, the semicolon after College Board is not needed.

8.2.6 (Assessment of Plan – however that is numbered – very confusing): What is this an assessment of – their high school education, their transition plan, what?

West Virginia Board of Education

Sandra M. Chapman, President
Paul J. Morris, Vice President
James J. MacCallum, Secretary
Barbara N. Fish
Sheila M. Hamilton
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Howard M. Persinger, Jr.
Ronald B. Spencer



interoffice
MEMORANDUM

To: Bill Luff
From: Carla Williamson
Date: May 24, 2002
Subject: Policy 2510

A handwritten signature in cursive script that reads "Carla".

I have attached my comments regarding Policy 2510 as it relates to Middle Childhood Education. If you have questions, I will be happy to meet with you to explain my thinking.

Attachment

CW:ep

pc: Pam Cain
G.A. McClung
Deborah Brown

Comments Regarding Policy 2510

Rationale

We must create significant change within our current middle level schools if we are to build an effective, high performing middle childhood education program. Stated simply, **we must stop trying to make our middle grades schools, as they are, better. Instead, we must make them different.** If we are to create middle grades schools that are academically excellent, developmentally responsive and socially equitable, we must set parameters within which individual schools, with their unique needs due to various grade configurations, may establish those structures and organizational arrangements that will support and sustain their trajectory toward excellence, and monitor student progress toward mastery of the content standards and objectives annually.

Policy 2510 is written in support of junior high school programming. The language in this policy restricts the local school system by reinforcing those very practices that have not, and do not, work for students in grades 5-8. As currently written, Policy 2510 allows schools to continue as they have been operating without seriously, and intentionally, addressing the issues of academic rigor and social equity **within a developmentally appropriate instructional environment in grades 5-8.**

We must remain cognizant of the unique characteristics of the young adolescent. **Children between the ages of 10 and 14 do not need either the protected coddling of the elementary school or the alienating subject departmentalization of the high school. They need a bridge between the two.** If we are not careful, too many requirements of the adolescent program will be passed to the middle childhood program, and we will, in truth, continue to dismantle existing middle childhood programs in the State.

Staffing in the middle grades has already been reduced in many counties as local school boards strive to meet the mandates of both elementary and adolescent programs. The **squeeze** is impacting middle childhood programming across the State. **Class size in the middle grades is increasing; teaming and personalization of the learning environment are disappearing.**

If we are to build a successful middle childhood education program, we must remove the randomness of interpersonal associations for the young adolescent and require the schools to build organizational structures that allow the teachers to become more knowledgeable about their students and to work together to meet their needs. Teachers at the middle level must strive to build relationships with students and parents.

For these reasons, we cannot continue to make the middle grades, as they are, better. We must make them different. Policy 2510 must include the language necessary to build a program for middle childhood education. Because those qualities or characteristics that set middle childhood education apart from early childhood or adolescent education are not addressed in Policy 2510, I make the following recommendations.

Recommendations

- 6.3.2 add the words “**unique, age-appropriate**” “*Middle childhood education builds upon the results of early childhood education and provides unique, age-appropriate education opportunities....*” This is supported by **6.4 Programs of Study** “Programs of study are introduced, emphasized and delivered in different ways at the four programmatic levels.”

Read the following with a lens on Middle Childhood Education and the requirements outlined for grades 5-8 in Policy 2510. **We must establish parameters and allow our middle grades professional staffs the flexibility necessary to accomplish our goals related to student mastery of content standards.**

- 6.4.7 Students who demonstrate mastery of content standards and objectives must be provided opportunities to progress to the next level of instruction. **Allow this statement to stand as written and eliminate the 8100 minutes (45 minutes daily) currently required for high school credits earned prior to grade 9.**

OR

- 7.2.13 addresses the scheduling of class periods in a manner that results in fewer than 8100 minutes of instructional time allotted for a high school course credit and makes provisions for vocational centers. **Add middle grades schools to this exception if we must keep the 8100-minute requirement.**

- 8.2.5 requires a skill improvement program at grade 8. **Should be grade 6. If we want them in Algebra I in grade 9, grade 8 is too late.**

Rationale for Revision of Chart III (Page 5-8)

By adopting the language to support teaming of teachers, especially in the core subjects, we can empower teachers and principals to determine time allocations based on the needs of students. (7.2.11) Students who need extended time in reading, language or mathematics (7.2.2b and 7.2.5) could be scheduled accordingly within the core team block. **We must structure grades 5-8 to effectively address the academic, social and developmental needs of any student who is deficient in the basic skills of reading, writing, mathematics and technology. A one-size fits all curriculum will not do this.**

Middle grades schools across West Virginia have placed students, in grades 5-8, with deficiencies in reading, writing and mathematics into extended instructional periods to address identified deficiencies. **Teachers and principals believe the student is better served by addressing the deficiencies at the beginning of the middle childhood experience, as opposed to a required basic skills program at grade 8, but this requires flexibility in scheduling to meet the needs of the individual student.** Due to staffing and other constraints, some schools are unable to do this. Some schools that are currently doing this are now experiencing difficulty due to the foreign language requirement.

Policy 2510 speaks to providing “specific instructional programs based on the needs of students,” allowing students who “*master the content standards and objectives to*

move to the next level of instruction,” and “attaining mastery of the basic skills in reading, writing, mathematics and technology.” However, the Policy, as an entire document, restricts the middle childhood staff in their efforts to make these things happen for students in the middle grades.

Example 1

Granting high school credit for Level 1 of a foreign language and Algebra I at the middle childhood level requires that these classes meet for a minimum of 45 minutes daily to acquire the required 8100 minutes of instruction for a high school credit. This imposes 45 minutes instructional blocks, within a minimum 330-minute instructional day, on middle grades schools. The teachers who teach these courses also teach other courses without a 45-minute requirement, but the middle school is required to make all courses 45 minutes in length because of the interconnectedness of the master schedule.

Example 2

In order to address serious reading deficiencies at the middle level, a number of our schools offer a reading, or literature, course separate from Language Arts. Schools call it Literature when they do not have a teacher certified in Reading to teach the course. These schools often have strong instrumental or vocal music programs, and many of your foreign language students also choose to participate in the music programs. *According to Policy 2510, these schools would be required to offer the following courses:*

- 1. Reading/Literature**
- 2. Language Arts**
- 3. Mathematics – Algebra I**
- 4. Science**
- 5. Social Studies**
- 6. PE/Health/Art/Music**
- 7. Foreign Language**
- 8. Instrumental or Vocal Music**

Developmentally appropriate middle grades schools should also have an advisory program. If we require these schools to schedule 8 courses for 45 minutes each, we have exceeded the 330-minute minimum by 30 minutes, and have left no time for an advisory program where students have regular contact with their adult advocate. We have also failed to address programs such as gifted education.

I recommend that we include language that encourages school staffs to think in terms of flexibility within the scheduling process—flexibility within given blocks of time for a particular grade, as well as flexibility across the middle grades - to meet the needs of students. By placing more emphasis on the teaming of teachers and students, and the allotment of an instructional block of time for instruction in the core subjects, we would be providing our schools with the flexibility necessary to address all the mandates placed upon them and to personalize the learning environment through the implementation of small, personalized learning communities.

By designating a minimum of 165-200* minutes per core team (Reading, English Language Arts, science, social studies and mathematics), we will establish realistic parameters, while allowing for flexibility. Also keep in mind **teaming of teachers and**

students allows flexible scheduling of instructional minutes on a daily basis. Only two of many possibilities are given below.

165-Minutes for Core Team

Reading and English – 40 minutes		Interdisciplinary Reading
Social Studies – 40 minutes		English LA & Soc. Studies –75
Science – 40 minutes	OR	Science – 45
Algebra I – 45 minutes		Pre-Alg/Geometry - 45

200-Minutes for Core Team

Reading		Reading	40	
English	75	English	40	
Science	40	OR	Science	40
Social Studies	40		Social Studies	40
Algebra I	45		Pre-Geom/Algebra	40

When we schedule students in a random impersonal manner, as we do in junior high schools, we eliminate the potential of flexible scheduling to meet the individual needs of students. More importantly, placing students and teachers in smaller personalized teams will allow us to better serve all students in the middle grades.

My remarks have not addressed a Related Arts Team that would encompass art, music, physical education and health, as well as any other electives or required electives offered by an individual school, but the same flexibility would hold true for these courses. See sample schedules on page 5.

To effectively schedule and deliver a middle grades instructional program that is research-based, we must step outside the secondary “junior high school” box. This will require training in master schedule building for all principals. Teachers will also have to be guided in a new way of thinking about time and how they utilize time effectively to target the content standards and objectives.

See samples of a master schedule that allows flexibility for grades 7 & 8

Closing

The adoption of research-based practices is cited as a strategy for achieving the West Virginia Goals and Refined Goals, but as it is written, Policy 2510 does not address the research related to Middle Childhood Education and the unique needs of this learner. **Research-based practices for middle childhood education include small, consistent learning communities with a personalized learning environment where teachers know their students and maintain close working relationships with the home. You will see an adult advocate or mentor for every student who takes an interest in the student’s successful learning, goal setting, career planning and personal growth. The curriculum is organized around concepts and principles and based on rigorous content standards. Classroom practices actively engage every student in learning experiences that are relevant and cognitively engaging. Data-driven decision-making keeps options open for all students by immediately addressing their academic needs.**

- These numbers are arbitrary, but do establish an expectation that the minimum number of instructional minutes per core class would average 40 minutes per day.

Carla Williamson, Coordinator
Middle Childhood Education

Sample Schedules for Grades 7 & 8

8TH GRADE - 220

Rotation or Related Arts Team Block 7:40-9:10			
Phys. Ed. and Aerobic Health & Fitness	Home Living Skills	Music Keyboarding	Health
REED	VOGLEMAN	MCKOWN	HELMS
Phys. Ed. and Aerobic Health & Fitness	Industrial Technology	Music Appreciation	Aquatics
AULT	RING	CULP	GATES
Academic Core Team Block (3 Sections) 9:15-11:36			
8th Grade Blue Team		8th Grade Gold Team	
Math	Dahl	Math	Lowden
Science	Milton	Science	Behrens
U.S. History	Hunt	U.S. History	Baillinger
Lang. Arts	Antrim	Lang. Arts	Hubers
Exp. L.A.	Koons	Art	Carey
8th Grade Lunch 11:38-12:08			
Academic Core Team Block (2 Sections) 12:13-1:45			
8th Grade Blue Team		8th Grade Gold Team	
Math	Dahl	Math	Lowden
Science	Milton	Science	Behrens
U.S. History	Hunt	U.S. History	Baillinger
Lang. Arts	Antrim	Lang. Arts	Hubers
Exp. L.A.	Koons	Art	Carey
8th Grade Blue Team Enrichment/Remediation 1:50-2:30		8th Grade Gold Team Enrichment/Remediation 1:50-2:30	

7TH GRADE - 220

Academic Core Team Block (4 Sections) 7:40-10:44			
7th Grade Blue Team		7th Grade Gold Team	
Math	Meyer	Math	Chavis
Science	Gibson	Science	Brinner
Geography	Warwick	Geography	Troxell
Lang. Arts	Argenta	Lang. Arts	Tanski
Foreign Cult.	Sullivan	World Affairs	Griswold
Rotation or Related Arts Team Block 10:49-12:15			
Phys. Ed. and Aerobic Health & Fitness	Home Living Skills	Music	Health
REED	VOGLEMAN	CULP	HELMS
Phys. Ed. and Aerobic Health & Fitness	Industrial Technology	Study Hall	Aquatics
AULT	RING	MERTENBERGER	GATES
7th Grade Lunch 12:24-12:54			
Academic Core Team Block (1 Section) 12:59-1:45			
7th Grade Blue Team		7th Grade Gold Team	
Math	Meyer	Math	Chavis
Science	Gibson	Science	Brinner
Geography	Warwick	Geography	Troxell
Lang. Arts	Argenta	Lang. Arts	Tanski
Foreign Cult.	Sullivan	World Affairs	Griswold
7th Grade Blue Team Enrichment/Remediation 1:50-2:30		7th Grade Gold Team Enrichment/Remediation 1:50-2:30	

Recommended Revisions to Chart III Middle Childhood 5-8

High-performing middle grades schools are academically excellent, developmentally responsive and socially equitable. These schools expand access to higher level content and instruction to include all students, and they challenge all students to use their minds well. The staffs are sensitive to the unique developmental challenges of early adolescence. In these schools you will see small, consistent learning communities comprised of teachers and students. High-performing middle grades schools keep positive options open for all students.

The core programs of study are based on rigorous content standards and shall be taught daily by a team of qualified teachers. The core programs of study will be offered within a block of time equal to a minimum of 165 minutes daily*. Assessment and evaluation promote learning. A reteach component will ensure mastery of the content standards and objectives at each grade level. The principal and the team of teachers will determine time allocations that effectively address the academic needs of students who are deficient in the basic skills of reading, writing and mathematics.

Reading and English Language Arts
Mathematics
Science
Social Studies

**If Reading and English Language Arts are taught as separate subjects, the core block should equal a minimum of 200 minutes*

These required programs of study shall be taught at each grade level each year as separate subjects within a related arts block of instructional time.

Art
Music*
Physical Education
Health

**Choral and instrumental music must be offered no later than grade six. Chorus or instrumental music may replace the required Music course at each grade level.*

Foreign Language

The teaching of foreign language as a separate program in grades five and six is encouraged.

Two years of the same foreign language must be offered for students in grades seven and eight. The foreign languages to be offered must be taught at the high school the middle school students will attend. Schools may choose from two learning sequences:

1. Seventh grade exploratory course(s)/Eighth grade Level I of the foreign language. Students will receive one high school credit at the end of eighth grade upon mastery of the content standards for the Level I course.
2. Seventh grade Level 1A of the foreign language/Eighth grade Level 1B of the language. The level I course is delivered over a two- year period. Students will receive one high school credit upon mastery of the content standards for the course.

These required programs of study shall be taught annually within the instructional day. They may be integrated or taught as a separate course.

Career Exploration** Developmental Guidance***

**These experiences based on content standards and objectives must be provided to students during grades five through eight. Where feasible, consideration should be given to using modular technology education labs to enhance career exploration.

***Developmental Guidance may be integrated or taught as a separate course. Placing developmental guidance within an advisory program is encouraged.

Career Awareness and the application of technology shall be taught in all programs of study.

Students demonstrating mastery of instructional grade level objectives in the subjects are to be provided the opportunity to advance to the next grade level objectives.

Students in grades 5-8 shall be provided with an adult advocate or mentor who takes an interest in the student's successful learning, goal setting, career planning and personal growth. Schools are encouraged to implement an organized advisory program to meet this requirement. Implementation of an advisory program will allow the schools to remove the randomness of interpersonal associations for students by personalizing their learning environment.

Schools are encouraged to deliver all courses outside the core programs of study within a related arts block of instructional time. This will allow flexibility in scheduling individual students in a manner that is appropriate and consistent with their diverse needs and interests.

Fax to: Wm. J. Luft, Jr.
(304) 558-0048

From: Peggy Cook
Stanaford Elem. School

I am very concerned about the Section of 2510 which states that attendance must be at 75% to constitute an "instructional day." What happens if we don't have 75%? Is this school wide or per classroom? Is there another day of school added as an "extra" day? What happens if we have an epidemic of sorts—childhood diseases or flu? Do teachers, bus drivers, aides, cooks, students, etc. who attended have to come the "extra" day? How are they paid?

Mr. Luff, please clarify some of these issues, and explain the fairness of this when compared to allowing secondary students absences for WVSSAC activities.

Thank you

Peggy Cook

Fax to: Wm. J. Luff, Jr.
(304) 558 - 0048

From: Bue Miller
Stanaford, Elem.

Fax to: Wm. J. Luff, Jr. (304) 558-0048

From: Sue Miller
Stanford Elementary

To Whom It May Concern,

Please clarify Secs. 5.39 and 7.2.12. Is this referring to school, county, or state? Are special exceptions going to be made concerning childhood diseases? Ex. Chicken Pox also, will Flu epidemics or closely related illnesses be the exception to this ruling?

Please explain how this ruling could be "fair" in comparison to the Secondary students that are allowed to be dismissed during the "instructional day" for extra-curricular activities? For example, the IVSSAC activities are excluded. Why should these students be excluded from instruction? Is this ruling just for Elementary Students? Is this ruling fair for all?

Will the Secondary students have to make up the time? Will there be extended days to be added to the school calendar?

Please clarify these issues for me.

Thank you,
Mrs. Sue Miller

Fax to: (304) 558-DD48

Wm. J. Luff, Jr.

From: Michelle Levin
Stanford Elementary

May 24, 2002

To Whom It May Concern:

Please clarify for me Section 2510 that states that attendance must be 75% to constitute an "instructional day". 75% of our school, our county....? Also what happens if we don't have 75% attendance?

Michelle Swin

**POLICY 2510
SERIES 42
ASSURING THE QUALITY OF EDUCATION: REGULATIONS FOR EDUCATION
PROGRAMS
COMMENT RESPONSE FORM**

Comment Period Ends: May 25, 2002

Please use this form when commenting on proposed Policy 2510. You may attach additional sheets if necessary.

Individual/Organization: Ronald E. Ray
Jackson County Schools

Title: Superintendent

Street Address: #1 School Street

City/State/Zip Code: Ripley, WV 25271

§126-42-1. General

§126-42-2. Purpose

§126-42-3. Scope

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§126-42-3. Scope

§126-42-4. General Responsibilities

§126-42-5. Glossary

5.39 Instructional Day - While 75% attendance is certainly low by current expectations and performance, to change a day from instructional to non-instructional if less than 75% of the students attend on any given day is not logical. There could be many different circumstances that could cause this to happen. Why not do away with Faculty Senates and have a legitimate 180 day of instruction.

§126-42-6. Program Definition

The requirements for a third year of a foreign language offering and the addition of a credit in civics will probably require additional staff and, therefore, additional funds contrary to fiscal note attached to the policy. Students in the professional pathway must take two years of a foreign language and will utilize the time allotted to current foreign language staff. If additional courses are going to be required, they should at the very least be funded.

§126-42-7. Program Delivery

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§126-42-8. Program Accountability

§126-42-9. Alternative Delivery Systems

Please return comments to:

**William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Building 6, Room 360, Capitol Complex
1900 Kanawha Boulevard East
Charleston, West Virginia 25305-0330
Fax Number: (304) 558-0048**

KANAWHA COUNTY SCHOOLS
OFFICE OF ADMINISTRATION AND INSTRUCTION
200 Elizabeth Street, Charleston, West Virginia 25311-2119

FAX TRANSMISSION SHEET

Office Telephone (304) 348-6145

Fax Number (304) 344-4293

TO: Bill Luff

WVDE 558-0048

FROM: C. Daniel

RE: Comments on 2510

PAGES TRANSMITTED: 7
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DATE: 5-24-02

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POLICY 2510
SERIES 42
ASSURING THE QUALITY OF EDUCATION: REGULATIONS FOR EDUCATION
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COMMENT RESPONSE FORM

Comment Period Ends: May 25, 2002

Please use this form when commenting on proposed Policy 2510. You may attach additional sheets if necessary.

Individual/Organization: Kanawha County Schools / Cindy Donie

Title: KCS Management Team

Street Address: 200 Elizabeth Street

City/State/Zip Code: Chas, WV 25311

§126-42-1. General

§126-42-2. Purpose

§126-42-3. Scope

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§126-42-5. Glossary

§126-42-6. Program Definition

6.4.2 - State needs to develop unified grading scale, especially w/ implementation of PROMISE requirements. No uniformity currently.

6.4.11c - Most high schools have completed scheduling for next year, what about students who have already scheduled for the senior year that don't have a full schedule? Countries need to be

~~§126-42-7. Program Delivery~~

Given one year to implement this requirement scheduling was completed prior to the policy going out for comment. Also, we have a few students who have applied for early graduation next year. What do they do now? We need a year to implement. When is the County Policy due?

8.2.6 B - higher level substitution - This needs to be clarified/explained. Interpreted to mean that AP courses cannot be substituted for required courses in English, Soc. Studies, etc. Contradicting. Please clarify.

~~§126-42-8. Program Accountability~~

~~§126-42-9. Alternative Delivery Systems~~

Error on p 27 - Chart IV B. One ~~16~~ adds up to 17, not 16.

- 7.2.12 - Needs to be deleted. What does this mean to Schools districts? Do schools have to make up these days? What about staff? Think about increment weather, SSAC tournaments, etc.

- 7.2.14 - Please clarify WSSAC sanctioned events - Does this mean any WSSAC sanctioned event or just tournaments?

P. 49 - D - What is the process for substituting another course for 4th math or science? Who "makes the call" that the substitution is more relevant? Will this be additional paperwork for counselors? Do parents have to agree and sign off? Too complicated, Confusing. Additional math and science will require

Please return comments to: 11.5 additional teachers for Kanawha County.

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Building 6, Room 360, Capitol Complex
1900 Kanawha Boulevard East
Charleston, West Virginia 25305-0330
Fax Number: (304) 558-0048

POLICY 2510
SERIES 42
ASSURING THE QUALITY OF EDUCATION: REGULATIONS FOR EDUCATION
PROGRAMS
COMMENT RESPONSE FORM

Comment Period Ends: May 25, 2002

Please use this form when commenting on proposed Policy 2510. You may attach additional sheets if necessary.

Individual/Organization: Kanawha County Schools
Title: Curriculum Assistant Principals
Street Address: 200 Elizabeth St.
City/State/Zip Code: Chas, WV 25311

§126-42-1. General

§126-42-2. Purpose

§126-42-3. Scope

§126-42-3. Scope

§126-42-4. General Responsibilities

§126-42-5. Glossary

§126-42-6. Program Definition

p 27 - Chart III B - Please consider Kan. ^{current} model of 15 civics /
15 economics
requirement for all seniors. Economics is
needed and should include financial literacy
objectives.

§126-42-7. ~~Program Delivery~~

5.4.15 - When are end of course exams given?
Who grades them?

7.2.12 - Delete 75% attendance requirement.
This could cause huge problems in Kan. ex
with make up days etc.

8.2.4 - Please clarify substitute courses, specifically AP for

POLICY 2510
SERIES 42
ASSURING THE QUALITY OF EDUCATION: REGULATIONS FOR EDUCATION
PROGRAMS
COMMENT RESPONSE FORM

Comment Period Ends: May 25, 2002

Please use this form when commenting on proposed Policy 2510. You may attach additional sheets if necessary.

Individual/Organization: Charles Tucker
Title: Principal Cedar Grove Community School
Street Address: P.O. Box J John Street
City/State/Zip Code: Cedar Grove, WV 25039

§126-42-1. General

Please eliminate the standard that requires 75% attendance for individual schools to be considered as an "instructional day". Schools that have an epidemic of influenza may not meet those standards.

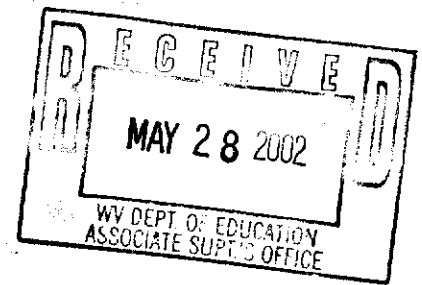
§126-42-3. Scope

TO: William J. Luff, Jr.
Deputy State Superintendent of Schools

FROM: Kristi Clay
Special Educator, Stanaford Elementary

DATE: May 24, 2002

RE: POLICY 2510



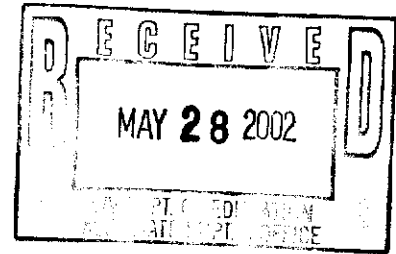
During our Faculty Senate Meeting we read Policy 2510 and have some major concerns. (Sec. 5.39 Instructional Day) is written to have 75% of the school's students in attendance in order to have an instructional day. What if you are present and teaching a day that has less than 75% in attendance? Do we get paid for that day? Do we have to repeat it later? How is this possible? How will service personnel, teachers, and other school staff be compensated for their extended time? From where will the funding come? Will snow days, no bus runs, and late arrival days affect this formula? Do the students who are in attendance on these days have to attend additional days? Do health epidemics such as the flu come into consideration at all? Why should we be accountable for what occurs out of our control?

There is also concern regarding "Banked Time" (Sec. 5.6). This policy stated that only 1.8 days may be used for extracurricular activities. This does not allow the necessary time for elementary schools to enrich student activities. Secondary schools are afforded the opportunity to include athletic events that are covered under the blanket of SSAC however, elementary schools are not sanctioned under SSAC. How will this affect our Responsible Student Programs? Elementary staff and students work many hours beyond the school day in preparation for after school athletic events including tournaments, practice, competition and preparation for competition. These include but are not limited to: Music programs and concerts, Science and Social Studies fairs, Math and Writing contests. It will also be difficult to implement incentives for students who achieve and accomplish goals. Why should athletics be more important than academics?

It is important that we as educators acknowledge student success, achievements and hard work. This should include both academic and athletic areas.

Kristi Clay

TO: *William J. Luff, Jr.*
Deputy State Superintendent of Schools



FROM: *Robert Tipane*
Music Instructor, Stanaford Elementary

DATE: *May 24, 2002*

RE: *POLICY 2510*

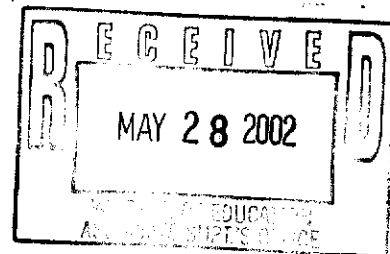
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It is important that we as educators acknowledge student success, achievements and hard work. This should include both academic and athletic areas.

Sincerely,
Robert Tipane

TO: *William J. Luff, Jr.*
Deputy State Superintendent of Schools



FROM: *Kathy Lewis*
Special Education Aide, Stanaford Elementary

DATE: *May 24, 2002*

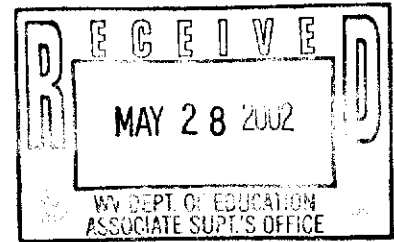
RE: *POLICY 2510*

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It is important that we as educators acknowledge student success, achievements and hard work. This should include academic and athletic areas.

Kathy Lewis



TO: William J. Luff, Jr.
Deputy State Superintendent of Schools

FROM: Sherry Dyke
2nd. Grade Teacher, Stanaford Elementary

DATE: May 24, 2002

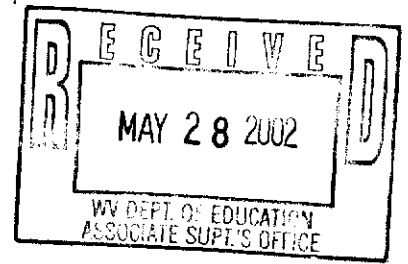
RE: POLICY 2510

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It is important that we as educators acknowledge student success, achievements and hard work. This should include academic and athletic areas.

Sherry M. Dyke



TO: William J. Luff, Jr.
Deputy State Superintendent of Schools

FROM: Sallie Cruz
2nd. Grade Teacher, Stanaford Elementary

DATE: May 24, 2002

RE: POLICY 2510

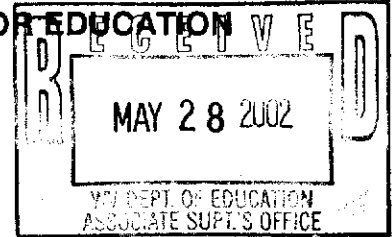
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It is important that we as educators acknowledge student success, achievements and hard work. This should include academic and athletic areas.

A handwritten signature in cursive script that reads "Sallie Cruz".

POLICY 2510
SERIES 42
ASSURING THE QUALITY OF EDUCATION: REGULATIONS FOR EDUCATION
PROGRAMS
COMMENT RESPONSE FORM



Comment Period Ends: May 25, 2002

Please use this form when commenting on proposed Policy 2510. You may attach additional sheets if necessary.

Individual/Organization: South Branch Vo Tech Ctr. - Robert Sisk

Title: Director

Street Address: 401 Pierpont St.

City/State/Zip Code: Petersburg WV 26847

§126-42-1. General I am concerned about more courses being required to be offered with less or not enough teachers available. South Branch had already felt pressure to offer the foundation classes from the participating schools and/or counties, SBVT does not have personnel that can meet these needs.

§126-42-2. Purpose

§126-42-3. Scope

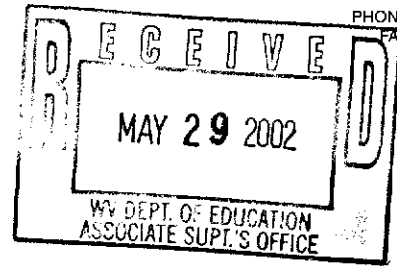
MINERAL COUNTY SCHOOLS

ONE BAKER PLACE

KEYSER, WEST VIRGINIA 26726

OFFICE OF SUPERINTENDENT

May 20, 2002



Dr. David Stewart
State Superintendent
West Virginia Department of Education
Building 6, Capitol Complex, Room 358
1900 Kanawha Boulevard, East
Charleston, WV 25305

Dear Dr. Stewart:

We, the President and Members of the Mineral County Board of Education, urge the W. Va. Board of Education to refrain from adopting policies that create unfunded mandates for local boards of education.

We only oppose Policy 2510 due to the financial burden placed upon the Mineral County Board of Education. It is anticipated that the cost to our Board of Education to be approximately \$140,000.00 annually.

To implement the W. Va. State Board of Education mandated middle school foreign language program next year will cost approximately \$106,000.00 annually. Again, we only oppose that policy due to it being unfunded.

The Mineral County Board of Education cannot continue to absorb these unfunded mandates. We have very little discretionary funds. Usually, in order to provide for unfunded mandates, we defer or eliminate maintenance to our facilities.

Again, we urge you to avoid policies that create unfunded mandates.

Sincerely,

President, Mineral County Board of Education

Vice-President, Mineral County Board of Education

Member, Mineral County Board of Education

Member, Mineral County Board of Education

Member, Mineral County Board of Education

CBK/db

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Friday, May 24, 2002 12:52 PM
To: Pam Bird
Subject: FW: Policy 2510

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: S. Wolenski [mailto:swolensk@access.k12.wv.us]
Sent: Friday, May 24, 2002 11:44 AM
To: wluff@access.k12.wv.us
Subject: Policy 2510

Concerning Policy 2510

5.39. Instructional Day - Time allocated within the school day for the teaching and mastery of content standards and objectives. The minimum instructional day for K-4 is 315 minutes, 5-8 is 330 minutes, and 9-12 is 345 minutes. (See Sec. 7.2.12) A minimum of 75% of the school's students must be in attendance as defined by Policy 4110 in order for the day to be counted as an instructional day.

This is not practical for these reasons:

- 1.If the decision to not count a day as an instructional day is determined on a school by school basis, the bus connections in rural counties would be impossible.
2. How will we know the school's attendance until the day has begun? Do we send the students home if the % is not 75%? Do we close the entire county or just that 1 school? How would parents who would have to arrange for child care have time to make arrangements? Working parents need to know ahead of time in order to be sure their children are being properly supervised. Many elementary students would not know where to go if sent home early.
3. How would days be made up by staff that has reported for work?
4. How would days be made up if 1 school were closed? Only that school would make up the day or would the entire county have to attend? (see bus issue #1)
5. Would the end of year date be moved if the number of days to make up exceeds the available OS days?

Please consider these concerns before passing Policy #2510.

Thank you,

Sandra Wolenski

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Friday, May 24, 2002 3:42 PM
To: Pam Bird
Subject: FW: Policy 2510

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: Gary D. Webb [mailto:gdwebb@access.k12.wv.us]
Sent: Friday, May 24, 2002 3:00 PM
To: wluff@access.k12.wv.us
Subject: Policy 2510

As an educator I am concerned with some of the changes to Policy 2510. Listed below are ones that need definite clarification:

1. #4 The percentage of students that must be in attendance in order for a day to be considered an "Instructional Day" has been specified at 75%(sec 5.39 and 7.2.12). Does this mean a classroom,school,or county? What about the students and teachers who are attending school that day. Will will they have to go an extra day? If for some reason (snow ,ice, flooding) and some bus can't run, do the other students that did come to school have to make up that day also?

In Elementary Schools where some contagious diseases or viruses cause many students to be absent . Do the ones who do come to school have to do that day over too?

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Friday, May 24, 2002 3:42 PM
To: Pam Bird
Subject: FW: comments policy 2510

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: Gayle Allen [mailto:gallen@access.k12.wv.us]
Sent: Friday, May 24, 2002 1:56 PM
To: William Luff
Subject: comments policy 2510

This is not practical for these reasons:

1. If the decision to not count a day as an instructional day is determined on a school by school basis, the bus connections in rural counties would be impossible.
2. How will we know the school's attendance until the day has begun? Do we send the students home if the % is not 75%? Do we close the entire county or just that 1 school? How would parents who would have to arrange for child care have time to make arrangements? Working parents need to know ahead of time in order to be sure their children are being properly supervised. Many elementary students would not know where to go if sent home early.
3. How would days be made up by staff that has reported for work?
4. How would days be made up if 1 school were closed? Only that school would make up the day or would the entire county have to attend? (see bus issue #1)
5. Would the end of year date be moved if the number of days to make up exceeds the available OS days?

Please consider these concerns before passing Policy #2510.

Sincerely,

Gayle Allen

Kindergarten teacher at Springfield Green Spring Elementary

Hampshire County

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Friday, May 24, 2002 3:43 PM
To: Pam Bird
Subject: FW: Policy 2510

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: jaclynsmith@peoplepc.com [mailto:jaclynsmith@peoplepc.com]
Sent: Friday, May 24, 2002 2:08 PM
To: wluff@access.k12.wv.us
Subject: Policy 2510

I have major concerns with Policy 2510. As an educator in Raleigh County I feel that 5.39. Instructional Day is ridiculous! Seventy-five percent of students must be in attendance for that day to be counted as an instructional day? Will I be paid for the days I teach to less than 75% of my class? Do the students who are in attendance on those days have to attend extra days because of the absences of their classmates? Also, how will the extra days of school be funded? Did you forget that teachers, administrators, service personnel, and other school staff must be compensated for these days? Will snow days, late arrival days, and days in which the weather is bad and busses do not run be counted in this silly policy?

PeoplePC: It's for people. And it's just smart.
<http://www.peoplepc.com>

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Friday, May 24, 2002 3:44 PM
To: Pam Bird
Subject: FW: policy 2510

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: Sally Martin [mailto:slgmarti@access.k12.wv.us]
Sent: Friday, May 24, 2002 1:16 PM
To: wluff@access.k12.wv.us
Subject: policy 2510

Comments re Policy 2510---

1. There seem to be very few advantages of having "bank time" now. This seems in effect, then, to encourage schools to shorten the length of the school day. As usual, though, sports once again seem to be excluded from this issue. Since Policy 2510 emphasizes 180 days of instruction, then it seems there should be no exceptions, and especially no exceptions made for something like sports, upon which there is already too much emphasis.
2. How will 75% attendance be determined in considering an instructional day? Will it be school-by-school or on a county basis? If so, then please consider that when a high school's football or basketball team plays in a state tournament during the day, attendance at that specific school will most likely drop below 75%. Is it equitable then to say that all schools in that county have not met the 75% requirement and that the day should not be counted as an instructional day? One must also consider inclement weather and hazardous road conditions. If buses do not run, but schools remain open for those who can make it, shouldn't this day be counted towards instruction even though attendance may be below 75%?
3. The requirement that all high school students be scheduled for the full instructional day for all four years sounds fine on paper, but will counties, whose budgets are already stretched thin, be able to find the funds to hire personnel for the additional classes that will be needed?
4. Who decided that a year's worth of learning takes place in 180 days? Why is that the magic number? I've known many, many students who

"get it" in 100 days, but I've also known many students who wouldn't "get it" if the school year were 500 days. It would be nice to see the SAT9 (or other standardized test) given in January or February and immediately graded. Those who score in the 90th percentile would have the option of ending their school year then or advancing to the next grade. Those who score under the 89th percentile would continue in school for the remainder of the year and perhaps even require additional schooling in the summer.

Since Policy 2510 addresses the quality of education, I maintain that there are other more important areas that need to be considered. These include (1.) more advanced placement classes for high school students . Students from WV who attend highly ranked colleges out of state find that they are at a disadvantage because of the limited number of AP classes available to them. (2.) Stricter enforcement of truancy laws, especially in regard to parents who find it necessary to take their children out of school for one, two, or three weeks at a time for family vacations to Disney World, Myrtle Beach, etc. This is a major problem already and seems to be increasing each year. Many parents already wait until after Labor Day to send their children to school, then schedule vacations during the school year, and then see fit to allow their children to miss school after Memorial Day. There is also a growing problem with children who miss for hair appointments, doctor/dental appointments, and even grocery shopping.

Thank you for your time in listening to my ranting and raving!
Sally G. Martin
Music Specialist - Shady Spring Elementary School, Raleigh County

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Tuesday, May 28, 2002 12:46 PM
To: Pam Bird
Subject: FW:

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: David Nuzum II [mailto:dan@access.mountain.net]
Sent: Sunday, May 26, 2002 4:33 AM
To: wluff@access.k12.wv.us
Subject:

Deputy Superintendent Luff,

I have some concern with the bank time provisions of policy 2510, section 7.2.14.c. While I certainly support the section's protection of instructional time, I am concerned with the effects that the 1% of instructional time limitation will have on high school extra-curricular programs when applied in a cumulative fashion.

While we limit any loss of time for trips other than those co-curricular in nature, two examples come to mind in our school.

First, the last couple of years our Fellowship of Christian Athletes have been permitted to take a school day to go through the C.O.P.E course at our local Boy Scout facility. It is a professionally run day course that is very close in nature and activities to the Outward Bound "low ropes, low impact" course. It teaches the same principles of team building, leadership, and innovative thinking for which the Outward Bound training is famous. This is certainly a good experience for our students who participate, but one that if we allow to continue, will consume over one half of the time allowed our school. One half our allowable time would be consumed by the roughly fifty students we can send through the course per year.

Another example is our Ski Club. Over the past couple of years, it has exposed many of our students to skiing by taking trips to Wisp for night skiing. It has also made a day trips to Snowshoe on weekends or holidays. These students have never traveled on instructional time. Some of the parents suggested that a Vermont ski trip be explored for next school year. The parents have offered to lead the fund raising to pay for about one half of the students' costs. The time selected would be over the Martin Luther King Holiday, so that three days of skiing could be provided while limiting time out of school to one day. (Our current county policy allows recreational clubs to be absent for one day instruction) Again, like the C.O.P.E. course, many of these students may never again have the opportunity to visit the New England area. Visiting a different part of our country and experiencing its somewhat different culture from our Mountain State has value for students, but again, would utilize one half of our school's time for extra-curricular events and trips. It is unfair for the thirty or forty students who would make the trip to take half of our school's time.

Most likely, these are the only trips our school would consider approving that are not WVSSAC sanctioned or co-curricular. I am sure we are not the only school that have one or two trips like these, that are clearly of value for the students participating, yet do not fall under a co-curricular "blanket". My concern is the cumulative fashion by which this time is allocated for the school. I would like to see the policy have a means for small groups such

as ours listed above to be allowed to continue participating in high quality activities, that have value for the student, without totally expending the schools bank time. I believe trips such as these, that give students quality experiences that cannot be provided in a classroom setting, should be permitted outside the bank time. I do not believe these should include activites like "reward days" to a park. However, what effect will this provision have on "Principal Parties" and other rewards that have been the back bone for the WW mandated Responsible Students programs?

Sincerely,
David Nuzum
Assistant Principal, East Fairmont High School

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Tuesday, May 28, 2002 12:48 PM
To: Pam Bird
Subject: FW: Policy 2510

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: Edward Poling [mailto:edpoling20@hotmail.com]
Sent: Saturday, May 25, 2002 8:26 PM
To: wluff@access.k12.wv.us
Subject: Policy 2510

It is ridiculous to include that 75% of the students be present to count the school day as an instructional day. We have no control over illness, the weather, or other circumstances that would affect attendance of our students.

Eileen Poling
Tucker County

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Tuesday, May 28, 2002 12:50 PM
To: Pam Bird
Subject: FW: Policy 2510

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: Karen Cummings [mailto:kcummings2000@citynet.net]
Sent: Saturday, May 25, 2002 10:23 PM
To: wluff@access.k12.wv.us
Subject: Policy 2510

The current version of policy 2510 out for comment through today has a couple of area's of concern that I would like to address.

First of all the addition of civics as a requirement, beginning in 2005-2006, is another intrusion on elective programs. I realize that this is the politically correct move for the state board to make in wake of 9/11. However, if this requirement stands as policy it will have a negative impact on all elective programs.

My guess is that this will remain a requirement regardless of the comments made about the policy. This seems evident since the Charleston Daily Mail has noted that the Dr. David Stewart, State Superintendent of Schools, is opposed to this proposal. I doubt that since the board went ahead with the decision to include civics, despite Dr. Stewart's comments, that my opinion will really matter much. Regardless, I have a suggestion that I would like to offer.

If civics remains a requirement the state board should consider altering the fine art credit to one of a fine or applied art. This would lessen the impact on all technical programs. If the state continues to mandate additional classes to be taught there is going to have to be some compromise if technical programs are to survive. This compromise could allow the state board to add a requirement without destroying quality technical programs.

My other concern is requiring all professional bound students to take two years of foreign language in the same concentration. This amounts to nothing more than another un-funded mandate for school systems. Many systems cannot afford additional state requirements without increases made in the state funding formula.

I hope that these two suggestions are at least considered. Thank you for your time and attention to this matter.

Sincerely,

Ben Cummings
Agriculture Teacher Wirt County High School
Vice President West Virginia Association of Agricultural Educators

5/29/02

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Tuesday, May 28, 2002 12:52 PM
To: Pam Bird
Subject: FW: Policy 2510 Comments

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: Mark & Joanne Fawcett [mailto:fawcett1@charter.net]
Sent: Friday, May 24, 2002 11:37 PM
To: wluff@access.k12.wv.us
Subject: Policy 2510 Comments

Dear Mr. Luff:

I am submitting comments on Policy 2510 which is currently on review. I have tried to identify the section and page number (px) that my comments refer to in the comments.

Section 3.1.1.a.E. (p2) It is not possible for many schools to increase their college going rate by 50%. My school (Magnolia HS) for example already has a 70-80% college going rate and it is not statistically possible to increase that to 105%. An increase in college going rate is not always what is needed anyway. Perhaps a minimum % should be set that is socially responsible. Not all students should go to college in any case.

Section 5.49 (p12) I think Professional, Technical, and Entry would be better names for the Pathways. Skilled sounds pretty old-fashioned to me. I do agree however with the descriptions of the three levels.

Section 5.59 9(p13) The paragraph contradicts itself when it allows the Beach Vocational Credit for entry or skilled level majors but on the next page, states that you must have the required third unit of science if you anticipate a two-year (skilled level) or four-year (professional) college.

While we are here, we need to do away with CATS 9 and CATS 10. Nobody understands what the courses are and with 11 spaces in WVEIS to specify the course title, it is very confusing to employers and out-of-state colleges. Colleges want to see Science and Biology!

Section 6.4.1.c (p17) I believe that a student that re-enters school after any amount of time out should have to complete the same graduation requirements he/she had when first enrolled. To do otherwise only stacks

the deck against the re-enrolling student.

Section 6.4.15 9 (p19) I believe that end-of-course exams might be of some use, but I do not believe they have proved sufficiently useful or fair enough to count for any part of a student's final grade at this point. There is too much variation from school to school and teacher to teacher to ever be able to fairly test all WV students with one end-of-course exam. Such high stakes testing has not proved useful in other states. It is much wiser to base student course grades on six week or nine week grades and a teacher made semester exam.

Chart III I do not believe that sufficient teachers are available to teach required Foreign Language in middle school. I strongly disagree with forcing this on middle schools. In addition, requiring the same foreign language be taught in middle and high schools will cause tremendous problems when teachers at either level leave the school. There is no compelling reason to force middle school students to begin learning a foreign language.

Chart IV (A) (p25) I do not agree that two of the three required math credits should be Algebra 1 and above. Many students do not need to know Geometry and in reality are not able to complete the necessary objectives. For college bound students, then Geometry and Algebra 2 are certainly recommended, but to require them for all students is not realistic. We only have one standard diploma, and it should reflect the completion of a minimum set of skills needed by ALL STUDENTS.

Chart IV (B) (p27) For a moment imagine that you are an admissions counselor at Stanford University. You get a transcript from a high school in WV. It has the following courses listed on the transcript: CATS 9, CATS 10, 20/21 Cent, ENG LA 10, can you decipher what they mean? When you have 20 other applicants for the same seat with decipherable transcripts, do you bother to find out what those cryptic courses are? Take a close look at the "approved" WVEIS course abbreviations and tell me if they are clear to anyone outside the WVDE, or even to most people in WV public schools.

Chart IV (B) (p28) We have one standard diploma. We should not have three sets of graduation requirements to get the same diploma. The students are not fools, they will simply all sign up as Entry Pathway students take the minimum courses plus the electives they want, and go on to college anyway. This is a nightmare for schools to check and enforce. Students will simply change their pathway when they have problems in a "required Professional" course, AND PARENTS WILL LET THEM!

Chart V (p29) Advanced Biology, Advanced Chemistry, Advanced Physics and Advanced Environmental/Earth Science are not really advanced courses. How can you take an advanced course when your transcript does not show that you completed the regular course? It is untrue to call them "Advanced" courses when they are not.

Chart V (p30) What about the 6th cluster -- Fine Arts and Humanities?

Section 6.6 (p32) What about Technology Support Services. WVDE and the WV Legislature has poured many millions of dollars into computer hardware and software, but has not provided one dollare for manpower to implement, maintain, or repair that equipment. RESA's you say! Three technicians for 6 counties is a joke, even for Ohio county where they spend most of their time. We need manpower in each school!

Section 7.2.12 (p38) Requiring 75% of an individual schools students to be in attendance in order for it to count as an instructional day is unfair. There are times when it is appropriate and desirable for students to attend school on a different schedule. A school for instance might have one day at the beginning of the school year for Freshmen student only as an orientation. It would be a real benefit to the incoming students and a reward for the upper classmen. When administering the SAT/9, to grades 9-11, it would be much easier for the school and less distracting to the students being tested if Seniors are not in the building. Bells would not have to ring, and additional staff would be available to assist in the testing.

Section 8.2.4 (p46) Certificates of Proficiency are an unnecessary paper work burden on the schools. In all the years they have been in place, I (a school counselor that handles most transcript requests for my school) have never had a single request from a parent, employer, or college for a copy of the Certificate of Proficiency. If this information is so important, then it should be included on the WVEIS transcript and printed automatically. To create a separate document which duplicates much of the information on the transcript is busy work.

Section 8.2.5 (p46) West Virginia students are pretty normal. It is unrealistic to believe that all of them will ever get up to the 50th %ile on any nationally standardized test. To require those that cannot to continually have "skills improvement" programs is unfair and only turns them off further on school. They would be much better off spending their time taking electives to prepare them for entry into the work force. Parent conferences to place them in a skills remediation program is also unrealistic. It would only be another level of meetings to schedule, faculty to remove from their teaching duties, and extra work for principals and counselors that cannot get all their work done now.

Bill, I realize my comments have been lengthy, but I have one more comment. Why are so many policies set for comment at the end of the school year? Do the members of the state board and the WVDE not realize that this is the busiest time of year for teachers, administrators and county office staff members. Could we not at least extend comment periods to some time AFTER school is dismissed? Is it really so much of a hurry that you could not accept comments until June 15th?

Thanks for taking the time to read these comments. I hope you will forward them to the appropriate persons to be considered in modifying Policy 2510.

Sincerely,
Mark Carl Fawcett

Mark Carl Fawcett

Home:
fawcett1@charter.net -- (304) 455-1822
210 Riverside Dr. New Martinsville, WV 26155

Office:
mfawcett@access.k12.wv.us -- (304)455-1990
Magnolia HS 601 Maple Ave.
New Martinsville, WV 26155

Pam Bird

From: William Luff [wluff@access.k12.wv.us]
Sent: Tuesday, May 28, 2002 12:53 PM
To: Pam Bird
Subject: FW: Policy 2510 comments

William J. Luff, Jr.
Deputy State Superintendent of Schools
West Virginia Department of Education
Capitol Complex
Charleston, WV 25305
(304) 558-3762

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

From: Phil Wyatt [mailto:pwyatt@access.k12.wv.us]
Sent: Tuesday, May 28, 2002 9:10 AM
To: wluff@access.k12.wv.us
Subject: Policy 2510 comments

Policy 2444.01 states that there is a graduation requirement of 1 unit for Applied Arts, Fine or Performing Arts, or Foreign Language. Policy 2510 graduation requirement is The Arts 1 course. It is my understanding that currently 2510 is in effect. But there is a conflict between these two policies, if indeed 2444.01 is in effect at all or is superceded by 2510

Thanks

Phil Wyatt, WV Music Educators Association, President-elect

Philip M. Wyatt
Washington Irving Middle School Band
443 Lee Avenue
Clarksburg, WV 26301
304-624-3273
pwyatt@access.k12.wv.us
wyatt@iolinc.net

Kristal Roberson
P.O. Box 61
Lost City, WV 26810

May 24, 2002

Mr. Lenore Zedosky, Executive Director
West Virginia Department of Education
Building 6, Room 309
1900 Kanawha Blvd., East
Charleston, WV 25305-9969

Dear Mr. Lenore

As both a parent of a rising 5th grader and a computer teacher, I would like to recommend that Policy 2510 include a requirement for keyboarding and computer applications. (This would be a total of 1 1/2 years).

The suggested policy is as follows:

Keyboarding taught to all students for one semester (daily) by a properly certified teacher for grades 5-8. This will ensure that students meet School to Work goals related to professional behavior in the work place. So many of the students develop improper keyboarding techniques and attitudes that do not meet School to Work goals.

In 9th or 10th grade students should take a Business Computer Application course taught by a certified teacher. The teacher will follow the CSOs for this course and ensure that all high school students have consistent and thorough instruction in MS Office or Corel word processing, spreadsheets, databases, presentation software, and internet research basics.

This policy ensures that all students have the capability of keying in their own reports for class work from the middle school level through grade 12. Also, they have the basic skills for spreadsheets, databases, and presentation software that they can use in entry-level jobs and for work-study positions in college offices when attending college.

Unfortunately, schools are cutting their business educators at a time when funds and student populations are decreasing in some (but not all) areas of West Virginia. Also, the increased academic requirements in high school math, social studies, and the arts (drama or dance) are preventing the students from learning computer skills from certified and experienced computer teachers that are usually business teachers.

As a parent and educator, I feel that as long as students can take music and art, drama and dance should be an elective that the school can, but does not have to offer (especially schools with less than 350 student enrollment). Computer education taught by a certified teacher should not be an elective but a requirement (for 1 1/2 semesters).

Lastly, certified business educators should also be able to teach Business Math and have it count as one of the four years of math credit. This will permit students who have difficulty with geometry, Algebra II, and trigonometry to take a course with practical requirements and have it count as math credit. (Yes, all students should be required to take through Algebra I. Most, but not all students, should take Applied Geometry).

Sincerely

A handwritten signature in cursive script that reads "Kristal Roberson". The signature is fluid and includes a long, sweeping underline that extends to the right.

Kristal Roberson, Parent
Business & Computer Teacher

Fax to : (304) 558-0048

William J. Luff, Jr.

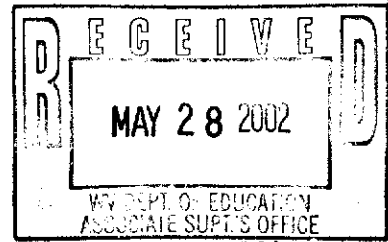
From : Judy Alfrey
Stanford Elementary

May 24, 2002

To Whom It May Concern:

Please clarify for me Section 2510 that states that attendance must be 75% to constitute an "instructional day". 75% of our school, our county....? Also what happens if we don't have 75% attendance? Is there another day of school added as an "extra" day?

Judy Alfroy



**POLICY 2510
SERIES 42**

**ASSURING THE QUALITY OF EDUCATION: REGULATIONS FOR EDUCATION
PROGRAMS
COMMENT RESPONSE FORM**

Comment Period Ends: May 25, 2002

Please use this form when commenting on proposed Policy 2510. You may attach additional sheets if necessary.

Individual/Organization: Hardy County Board of Education

Title: Ron Whetzel, Superintendent

Street Address: 510 Ashby Street

City/State/Zip Code: Moorefield, WV 26836

126 - 42 - 3 Scope

3.3 - In the identification of system requirements the statement for art is incomplete.

Recommendation: Revise statement to "develop an appreciation for and create and participate in the creative arts".

**POLICY 2510
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7.2.12 – The establishment of a percentage of student attendance at 75% is unworkable.

- Over the past three years our county has been affected numerous times by circumstances resulting in the canceling of schools in one section of the county or the other. If this rule would have been in effect the result would have been keeping all students home, or returned from school to home during the school day. This would have been done in order for they day to be made up later for the entire county. This would have used days that would have been reserved for snow-make up. The end result would have been less days of instruction overall.
- There is no “magic” percentage that will work for every county.
- Decisions to cancel school are not made lightly or without serious consideration.

Recommendation: Records should be maintained by each county as to the days of attendance by county and individual school. These may be reviewed by OEPA to determine if abuses exist. Decisions to cancel classes, at a school or as a county, are local decisions. Abuses may be dealt with by the appropriate regulatory agencies. The outcome measure of “average daily attendance” could be used as the standard.

Chart IV (B) – the additional requirement of CIVICS is certainly commendable.

However the following areas must be addressed:

- Reduction of electives – tremendous problems already exist in providing students sufficient time to address the requirements of the career plans, vocational technical programming, fine arts requirements, etc... that have already been added. This will be the 4th new requirement (in the last three years).
- There has been no reduction in expectations in any other area to balance out new requirements.
- There are no teachers currently available to address this class. At a minimum the cost will include a teacher, space, equipment, and instructional materials – none of which are available in our system.
- This is clearly a cost item – yet not reflected in the fiscal note.

Recommendation: When the Learning Outcomes for Civics are developed they are to be incorporated by the individual counties into social studies classes already required. Decisions to the best means to incorporate instruction into existing classes, at a school or as a county, are local decisions. Abuses may be dealt with by the appropriate regulatory agencies. The “outcome measure” of achievement on the End-of-course test (which would include civics questions) would be used as the standard.

7.3g: The informal assessment requirements have resulted in a tremendous burden on local districts.

- The assessment requires training for staff (this is compounded by: numerous other new requirements for training; no reduction in previous requirements were made; no increase in available time for continuing education; and the requirement that non-instructional days be available for conversion into instructional days).
- This will mean additional cost to compensate teachers in order to have them available for training.
- The time for administration of these extensive series of individual assessments will certainly impact instruction.
- Cost for preparing the assessment instruments are to be absorbed by the county.
- There is no fiscal note attached.

Recommendation: Cost for training and materials should be addressed in the state funding assessments.

**POLICY 2510
SERIES 42
ASSURING THE QUALITY OF EDUCATION: REGULATIONS FOR EDUCATION
PROGRAMS
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Comment Period Ends: May 25, 2002

Please use this form when commenting on proposed Policy 2510. You may attach additional sheets if necessary.

Individual/Organization: Hardy County Board of Education

Title: Ron Whetzel, Superintendent

Street Address: 510 Ashby Street

City/State/Zip Code: Moorefield, WV 26836

126 - 42 -8 Program Accountability

8.2.5: The requirement that parents "must be involved" is vague. Remedial/reteach programs are already in effect for students.

- What is the result if parents do not attend the conference?
- When are these conferences to be scheduled?
- May a parent refuse enrollment?
- What consequences exist if a student is not enrolled?
- There is no fiscal note for such a program.
- If this is an additional class then there are not personnel, space, equipment or materials available.
- If this is a separate class it now becomes, potentially, a four-year/four credit requirement further impacting the previous effects of increased requirements. We are now at the point where students have no elective choices remaining.
- This would require approximately 47,000 parent conferences to be held at the beginning of each school year.

Recommendation: Decisions regarding the organization and delivery of skill improvement programs are local decisions. Abuses or failure to deliver programs may be dealt with by the appropriate regulatory agencies. The outcome measure would be that students show improvement in percentile scores.

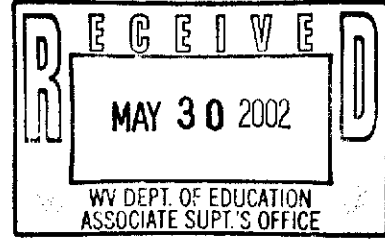


**WEST VIRGINIA
HIGHER
EDUCATION
POLICY
COMMISSION**

JOHN R. HOBLITZELL
CHAIR

J. MICHAEL MULLEN
CHANCELLOR

May 28, 2002



Mr. Bill Luff
Deputy Superintendent of Schools
Building 6, Room 358
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330

Dear Mr. Luff:

I offer the following comments on *Policy 2510, Assuring the Quality of Education: Regulations for Education Programs*.

At its meeting on April 19, 2002, the West Virginia Higher Education Policy Commission took a bold step to increase the standards for undergraduate admission requirements.

Series 23, Standards for Undergraduate Admissions of the West Virginia Higher Education Policy Commission establishes standards and procedures for undergraduate institutional admissions policies. The major change is to implement new baccalaureate admissions standards beginning with the 2007 fall semester. The high school unit requirements for regular baccalaureate admissions would increase to 4 in mathematics and 3 in lab sciences (effectively 4 units since Coordinated and Thematic Science I and II combined continue to count as one lab science unit). Additionally, a specified number of units would be required for the first time in foreign language (2), Arts (1) and Communications/Computer Applications (1).

We understand that computer applications have been incorporated into the content courses and will be validated by competency examination. If this is true, we will eliminate this requirement when final action is taken on the rule.

The standards proposed in *Policy 2510, Assuring the Quality of Education: Regulations for Education Programs*, are not totally in sync with the standards established for higher education. In order for these improvements to work, I offer several points on behalf of the Higher Education Policy Commission:

1. The Higher Education Policy Commission believes that these two policies need to be well coordinated between the Commission and the Board of Education. The policies should be coordinated to ensure a quality education for West Virginia's students. Is it possible to agree on implementation for entering high school freshmen of fall 2004, who will be the entering collegiate freshman of 2008?

2. The Higher Education Policy Commission offers to reduce the stress on the smaller county school districts through an agreement in which the community and technical colleges and/or four-year institutions would offer the newly required courses. The courses would be offered in-person or through electronic delivery.
3. Rather than requiring the implementation of all courses with the entering freshman class, the pressures on schools systems would appear to be reduced if course requirements were phased in over the four years.
4. Undergraduate courses are used to establish certification of content areas but not recognized for salary placement purposes. Legislative action permitted the use of such courses for support personnel. Would it be possible to allow teachers to use content courses, especially in shortage areas, to qualify for certification, re-certification, and salary placement?
5. Is there interest in a cooperative program between the Department, West Virginia University and the College Board to expand opportunities for teachers of Advanced Placement courses?

The Higher Education Policy Commission has the means to prepare teachers in order to teach the advanced curriculum. However, this will require the close cooperation of our offices to make it a reality.

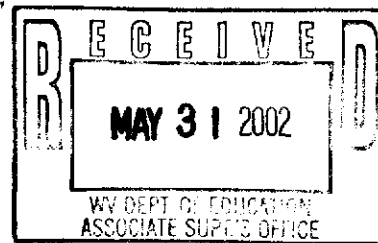
The Policy Commission stands ready to assist the Board of Education to succeed in this bold endeavor. Please contact me at 558-0699 to discuss further.

Sincerely,



J. Michael Mullen
Chancellor

cc: John R. Hoblitzell, Esq.
Chair, West Virginia Higher Education Policy Commission



Dear Sir,

I am aware of the State Department's efforts to ensure that schools have 180 days of school per year and I agree with this idea. I am concerned especially in Raleigh County about the number of school days lost. Raleigh County has an incentive program to encourage high school students to attend school. As I understand this program, any student who does not miss more than 5 days in one semester and has a C average, is exempt from taking semester test. In most classes there are only 4 or 5 students who have to take the tests.

Semester tests takes two days each semester. In addition, teachers have two days to review for the semester tests and if a student is exempt from taking the tests, he doesn't have to attend these two days. That makes 4 days many students can legally not attend school each semester for a total of eight days per year. These students are excused so I don't believe that they are counted absent. Therefore, they would not show up under the new requirement that would require 75% of the students to be present in order for a school day to count as a day of instruction.

I would like for your office to investigate this program. If it is the way that I understand it, I think it needs to be eliminated. Every student should take semester tests.

I would also like to suggest that Faculty Senate meetings be conducted after school and pay the teachers for attending. Many students don't bother to attend just for half a day and this causes the attendance rate to go down. I suspect that some schools with low attendance rates don't count the children absent on these days.

Thank you.